UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 14 2009

REPLY TO THE ATTENTION OF: L-8J

VIA E-MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED 7001 0320 0006 0192 8269

Mr. Jeroen Winterink
Conestoga-Rovers & Associates
9033 Meridian Way
West Chester, Ohio 45069

RE: Approval with Conditions for Risk-Based Cleanup and Disposal of PCBs
City Scrap and Salvage Company, Akron, Ohio

Dear Mr. Winterink:

The U.S. Environmental Protection Agency approves the application submitted by Conestoga-Rovers & Associates on August 3, 2009, and revised Figures 4a and 4b of the application e-mailed on August 5, 2009, to cleanup and dispose of polychlorinated biphenyls (PCBs) at the City Scrap and Salvage Company (CSSC) facility located at 611 W. Wilbeth Road in Akron, Ohio.

This Approval allows the cleanup and disposal of PCB remediation waste consisting of surface soil and concrete which was characterized as containing PCBs greater than 1 but less than 100 parts per million (ppm). PCB remediation waste found on-site that contains greater than 10 ppm PCBs will be excavated and disposed off-site. PCB remediation waste found on-site that contains less than 10 ppm but greater than 1 ppm PCBs will either be excavated and disposed off-site or disposed on-site under a minimum 9" concrete cover. All PCB remediation waste located off-site at the perimeter of CSSC property containing greater than 1 ppm PCBs will be excavated and disposed off-site.

This Approval is granted in accordance with 40 C.F.R. § 761.61(c) under which the Regional Administrator may approve a method to sample, cleanup, or dispose of PCB remediation waste if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. The authority to grant such approvals in Region 5 has been delegated to the Land and Chemicals Division Director.

EPA grants this Approval based on our finding that the cleanup of PCB remediation waste at and in the vicinity of the CSSC facility and its off-site disposal, in compliance with the terms and enclosed conditions of this letter, does not pose an unreasonable risk of injury to health or the environment. This Approval is effective as of the date of this letter.

CSSC must complete the risk-based cleanup and disposal in accordance with the approved August 3, 2009, application, revised Figures 4a and 4b of the application, and enclosed conditions of approval. If CSSC deviates from the terms and enclosed conditions of this letter without prior written approval of EPA, it may result in the immediate suspension of this Approval, the commencement of proceedings to revoke this Approval, and/or an enforcement action. In addition, this Approval may be suspended or revoked at any time if EPA has reason to believe that the continued cleanup and off-site disposal of PCB remediation waste from the CSSC presents an unreasonable risk to human health or the environment.

This Approval does not relieve CSSC from the responsibility to comply with all applicable provisions of TSCA and the federal PCB regulations or any other applicable, federal, state or local regulations or permits. This Approval does not preclude EPA from initiating an enforcement action, including seeking civil penalties, for violations of TSCA and the federal PCB regulations.

If you have any questions, please contact Ken Bardo of my staff at 312-886-7566.

Sincerely,

for Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

ENCLOSURE

Conditions of Approval
City Scrap and Salvage Company
611 W. Wilbeth Road, Akron, Ohio

A. Authorized Remedial Action

City Scrap and Salvage Company (CSSC) is authorized to cleanup and dispose of PCBs at its facility located at 611 W. Wilbeth Road in Akron, Ohio according to the Conditions of Approval described below, and the application for risk-based disposal submitted by Conestoga-Rovers & Associates on August 3, 2009, and revised Figures 4a and 4b of the application submitted on August 5, 2009. In the event that the Conditions of Approval are inconsistent with the procedures described in the application for risk-based disposal, CSSC must abide by the Conditions of Approval.

B. PCB Remediation

1. PCB-contaminated soil must be cleaned up to the remediation levels specified in the application for risk-based disposal as summarized and modified below:

a. For the area to be remediated at and in the vicinity of the Shredder Building where a minimum 9" concrete cover will be placed after excavation of PCB-contaminated soil and concrete (see attached Figures 4a and 4b), all post-removal verification samples of soil and concrete from the excavation floors and sidewalls must contain <10 ppm total PCBs.

b. For the area to be partially remediated at and west of the Shredder Building that is not to be covered with a minimum 9" concrete cover (see attached Figure 4a), all post-removal verification samples of soil from the excavation floors and sidewalls in the remediated area must contain <10 ppm total PCBs and the average concentration of total PCBs in surface soil (0 - 2') in the unremediated area (i.e., historical data and post-removal verification samples) is ≤1 ppm total PCBs.

c. For the area to be partially remediated east of the Shredder Building that is not to be covered with a minimum 9" concrete cover (see attached Figures 4b and 4c), all post-removal verification samples of soil from the excavation floors and sidewalls must contain <10 ppm total PCBs and the average concentration of total PCBs in surface soil (0 - 2') in the unremediated area (i.e., historical data and post-removal verification samples) is ≤1 ppm total PCBs.

d. For all off-site areas to be remediated to the north in the vicinity of the CSX railroad tracks and to the south in the vicinity of Flora Avenue, all post-removal

verification samples of soil from the excavation floors and sidewalls must contain ≤1 ppm total PCBs.

2. In Figure 4b of the application for risk-based disposal, the large excavation at the north property boundary must be extended approximately 5-feet to the south so that the excavation of soil includes sample locations B-464 and B-469, prior to conducting post-removal verification sampling.

3. In Figure 4b of the application for risk-based disposal, conduct a minimum 10-foot by 10-foot excavation of PCB-contaminated soil and post-removal verification sampling at sample location B-259.

4. For proposed additional shallow soil sample locations B-805 to B-815 (see attached Figure 4a), samples will be collected at the time of mobilization. The data will be used to determine and adjust the extent of the excavations, as necessary, to ensure that all soil containing ≥10 ppm total PCBs is excavated and disposed off-site.

C. Disposal of Remediation Waste

Materials contaminated with PCBs must be disposed of off-site as a regulated PCB waste or in accordance with the off-site disposal guidelines specified in the application for risk-based disposal which are consistent with and considered as disposal of PCB remediation waste found at 40 C.F.R. § 761.61(a). The historical in-situ sampling that has been conducted or proposed in the application for risk-based disposal may be used to characterize the materials for off-site disposal

All equipment that comes in contact with the PCB remediation waste must be decontaminated following the procedures found at 40 C.F.R. § 761.79(b) or (c).

D. Inspection and Maintenance

The minimum 9" concrete cover to be placed in the vicinity of the Shredder Building must be inspected at least once per year for evidence of cracks, settlement, or other effects that could impair the integrity of the cap and allow for human exposure to underlying soil contaminated with total PCBs >1 ppm. Repairs shall begin within 72 hours of discovery for any breaches which would impair the integrity of the cap and potentially pose a risk to workers.

E. Well Abandonment

When determined by CSSC to be no longer necessary, monitoring wells MW-103, MW-104, MW-205, and MW-206 shall be abandoned and properly sealed in accordance with Ohio Administrative Code 3701-28-07.

F. Property Use and Restrictions

Within 45 days of completing the remediation required under this conditional approval, CSSC must record, in accordance with State law, a notation on the deed to the property or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:

1. that the land has been used for PCB remediation waste disposal.
2. of the existence of the concrete cover and the requirement to maintain the concrete cover.
3. of the existence of the fence and the requirement to maintain the fence and keep the gates locked.
4. of the applicable cleanup levels left at the facility, both inside the fence and under the concrete cover.
5. of the land use restrictions for industrial and commercial purposes only.

G. Remediation Complete Report

Within 60 days of completing the remediation under this conditional approval, CSSC must submit to EPA:

1. an analysis of post-removal verification sample results and demonstration that the areas on the property not covered with concrete have average total PCB concentrations remaining in surface soil <1 ppm, and the area covered with concrete has total PCB concentrations remaining in surface soil <10 ppm.
2. a description of the final specifications of the concrete cover, including a map showing its exact location.
3. a summary of the off-site disposal activities.
4. a discussion of the implementation of any EPA-approved modifications to this conditional approval.
5. a certification, signed by the owner, that it has recorded the notation on the deed for property use and restrictions.

H. Change of Ownership

CSSC must notify EPA within 20 working days of any conveyance of ownership or responsibility of the facility property. Such notice must include the date of the intended conveyance, and the name, address, and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice must also include the name of a contact person.

At least 10 working days before such conveyance, CSSC must submit to EPA a notarized affidavit signed by the intended new owner or responsible person that states that such person is

aware of and shall abide by the provisions of the risk-based disposal conditional approval granted to CSSC for this facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 23, 2010

REPLY TO THE ATTENTION OF: LU-9J

Mr. Jeroen Winterink
Conestoga-Rovers & Associates
9033 Meridian Way
West Chester, Ohio 45069

RE: Remediation Complete Report for Risk Based Disposal
City Scrap & Salvage Company
Akron, Ohio

Dear Mr. Winterink:

The United States Environmental Protection Agency, Region 5 (EPA) has reviewed the *Remediation Complete Report of Risk Based Disposal, Remediation of PCB Impacted Soils Under 40 CFR 761.61C* submitted on February 4, 2010, for the City Scrap & Salvage Company (CSSC). The CSSC site consists of a narrow 6-acre parcel of property located at 785 Flora Avenue in the City of Akron, Summit County, Ohio.

The report documents the soil removal activities, post soil removal confirmation sampling, and disposal of PCB-impacted soil commenced on August 24, 2009, and completed on December 18, 2009, as required by the EPA August 14, 2009, letter providing approval with conditions for risk-based cleanup and disposal of PCBs at the CSSC property.

Over 282 tons of soil containing PCBs greater than 50 parts per million (ppm) was removed and disposed off-site at the EQ Landfill in Belleville, Michigan. Over 3,300 tons of soil containing PCBs less than 50 ppm was removed and disposed off-site at the WM American Landfill located in Waynesburg, Ohio. The PCB soil remediation objectives of: 1) less than 10 parts per million (ppm) under the minimum 9" new concrete slab in the vicinity of the Shredder Building; 2) total concentrations less than 10 ppm and an average of less than 1 ppm in exposed areas west and east of the Shredder Building; and 3) less than 1 ppm at all off-site locations along Flora Avenue and CSX Railroad property, was achieved following completion of the soil excavation and re-excavation described and certified in the report.

To satisfy EPA's condition for property use and restrictions, a deed restriction was filed in the County of Summit, Recorder's Office on February 3, 2010. The deed restriction establishes an environmental land use control on the property (legal description and map of the property provided in Exhibits A and B), provides for the property to be only used for industrial or commercial uses, and provides for the requirement and maintenance of a security fence and concrete slab cap on the property.

Based on this information, EPA concurs that PCB remediation activities are complete at the CSSC site. This letter does not relieve the site owner from compliance with any other federal, state or local regulations and does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties for any violation of federal regulations. Conditions of EPA's approval of August 14, 2009, and other applicable requirements of TSCA and its regulations will continue to apply to the site after any change in ownership.

If you have any further questions regarding this matter, please feel free to contact me at (312) 886-7566.

Sincerely,

Kenneth Bardo
Environmental Scientist
Remediation and Reuse Branch

cc: Karen Nesbit, Ohio EPA

CONESTOGA-ROVERS
& ASSOCIATES

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November 30, 2010 Reference No. 053724

Ms. Susan Hedman
U.S. EPA Region V
77 W. Jackson Blvd. (LU-9J)
Chicago, IL 60604

Dear Ms. Hedman:

Re: Cleanup Completion Summary- Self- Implementing PCB Cleanup
Remediation of PCB Impacts Under 40 CFR 761.61
City Scrap and Salvage Facility
Akron, Ohio

On behalf of our client, City Scrap and Salvage Co. (CSSC), Conestoga-Rovers & Associates (CRA) has prepared this Cleanup Completion Summary (CCS) for the self-implementing cleanup of the Shredder Engine Building located at the CSSC facility in Akron, Ohio. This letter has been prepared to provide the information requested by USEPA in a letter dated November 15, 2010 that provided approval to proceed with a self-implementing cleanup for the CSSC facility described in a request for approval letter to the USEPA dated November 5, 2010. In particular, this letter provides the details of the self implementing cleanup recently completed at the CSSC facility in accordance with 40 CFR 761. 61 (a) for the continued use and operation of the facility.

This letter report has been organized to include a brief description of the CSSC facility, characterization data per 40 CFR 761.61 (3) B and C, details of the cleanup conducted per, post-cleanup verification results per 40 CFR 761 part P, information regarding surface encapsulation per 40 CFR 761.30 (p), required on-going operation and maintenance within the facility and a copy of the signed certification required per 40 CFR 761.61 (3) E. A copy of the disposal records, once available, will be forwarded under separate cover.

The owners of the property had requested to implement important control measures within the Shredder Engine Building right away, and had retained a qualified contractor, SUNPRO, Inc. (SUNPRO) of Akron, Ohio who commenced this cleanup work on November 9, 2010. As described within this CCS report, the work was completed on November 20, 2010 and the facility has since resumed operations.

The cleaning and encapsulation was undertaken to ensure that all of the surface oils, grease and grime within the shredder engine building were removed, and the remaining surfaces were sealed with an appropriate coating that can be maintained. In accordance with 40 CFR 761.30

(p) continued use of porous surfaces, the residual PCBs within the concrete were encapsulated limiting their ability to elute or to commingle with future releases of oil or grease within the building. As a final measure, oils and greases that may accumulate in the floor sumps on the lower floor of the structure will be collected and characterized for PCBs and will be managed according to the "as found" concentration of PCBs in the future. We understand that the future management of wastewater and waste oil generated during normal operations, or as part of routine facility maintenance cleaning, will not be subject to the notification, decontamination, and verification sampling requirements contained in 40 CFR 761.

Remediation activities at the Site commenced over one year ago, and the owners of the Site continue to be motivated to address the PCBs that were present at the Site. Consistent with the approval given by USEPA of the risk based approach implemented in accordance with 40 CFR 761.61 (c), a notation on the deed to the property that identifies the presence of residual PCBs on the property along with an activity use limitation was recorded at the Summit County registrar's office earlier this year following the remedial work undertaken on the property.

The Site has operated as a metal salvage and car shredding facility since the 1940s. An active mainline railway bounds the Site to the north while Flora Avenue and Cotter Merchandise Storage Company are adjacent to the southern boundary.

1.0 SITE DESCRIPTION

The Site is bounded to the north by an active rail line, owned and operated by CSX. A fence separates the CSX railway from the scrap yard. The eastern south boundary of the Lower Yard is located along a steep embankment and then Flora Avenue, while the western south boundary is also located along a steep embankment that has an inactive rail siding and the Cotter Merchandise Storage Company Building. A buried storm drain culvert that originates north of the CSX railway discharges along the southern side of the Site, near the intersection of Flora and 11th Street. The effluent from this culvert flows south into a shallow ditch that then flows into another culvert which flows south under Flora Avenue to another ditch located south of Flora Avenue.

The Shredder Engine Building is a concrete and steel structure that has a footprint area of approximately 900 square feet. The Shredder Building houses two, 1,500 horsepower natural gas fuelled motors that power the metal shredder mill located along the north side exterior of the building. The two large motors are located on the upper floor of the Shredder Engine Building, along with hydraulic pumps, oil coolers, air compressors and various supplies and materials needed to operate the shredder. The ground level (or lower level) has been used primarily for storage of equipment, parts and materials utilized for operation of the shredder.

Two blind sumps are located in the lower level that accumulate fluids from shredder motors and controls.

A Remediation Complete Report (RC) was submitted to USEPA on February 4, 2010, for the remediation work previously completed at the CSSC facility. The RC Report was prepared in accordance with the requirements of "The Approval With Condition" letter received from USEPA dated August 14, 2009 for approval to proceed with the Risk-Based Disposal as described in the letter to USEPA dated August 3, 2009 and revised Figures 4a and 4b of the application emailed on August 5, 2009 for the cleanup of Polychlorinated Biphenyls (PCB) impacted soils at the CSSC Facility located in Akron, Ohio. On February 23, 2010, USEPA provided a letter concurring that remediation was complete for the Site soils.

2.0 SHREDDER BUILDING GROUND LEVEL INVESTIGATION

Within the Shredder Building were two shallow sumps, each constructed from a thin gage steel drum that were set into the concrete floor. Neither sump was completed with an inlet or an outlet and simply were devices that would accumulate fluids within the shredder building. The steel had corroded with time and were no longer impervious. Samples collected in June of 2010 of the liquid that accumulated within the sump was found to contain PCBs. In order to determine the source of the PCBs in the Shredder Building sumps, two pathways were considered – inward leakage from contaminated ground or surface leakage from a source within the shredder building. The source within the building could cause an impact to the ground through the non-intact sumps, although the building has a solid concrete foundation wall that extends from the subgrade to the underside of the upper level, which confines water within the foundation walls.

To determine if the source was within the building, samples of the oils and grease used in the building were obtained from the equipment in June 2010 and were analyzed for PCB content. These results were included in CRA's November 5, 2010 letter. To determine if the subsurface was either the source or if the subsurface was impacted, soil samples were collected from below the floor slab within the building using a split spoon sampler manually advanced and then extracted from the subsurface soils. Soil samples were analyzed for PCB content. The analytical results for these soil samples are summarized in Table 1. The location of the soil borings is presented on Figure 3. The soil samples were selected for analysis based on visible staining of the soils.

In accordance with the August 2009 Approval with Conditions from USEPA, namely, all post-removal verification samples of soil and concrete taken from an area that will be under concrete, must contain less than 10 ppm total PCBs, all post-removal verification samples of soil

from the excavation floors and sidewalls in the remediated area must also contain less than 10 ppm total PCBs and the average concentration of total PCBs in surface soil (0 to 2 feet) in the unremediated area (i.e., historical data and post-removal verification samples) be less than or equal to 1 ppm total PCBs.

The analytical results for the oils and grease within the equipment were non-detect for PCB, suggesting that the PCB source is not the equipment. Furthermore, the analytical results for the soil samples indicate that the PCB concentration in the clay soil under the floor slab is lower than the PCB concentration found in samples obtained from the sumps, suggesting that the source of the PCB found in the sump is not from under the floor slab.

When fluids were removed from the sumps, water and oil would continue to flow into the sumps through perforations in the side walls. Given the oily nature of the fluids that can accumulate in the floor sumps, and surrounding annular space, the sumps needed to be replaced. Once the sumps were removed, the soil surrounding the sumps was analyzed for PCB content.

To confirm that groundwater near the shredder building was not impacted with PCBs, a new groundwater monitoring well (MW-104A) was installed at the location of former monitoring well MW-104, approximately 30 feet from the Shredder Building, and was screened at the same interval as former MW-104, across the shallow groundwater interface. The well was completed in the uppermost water bearing zone located at the Site. A groundwater sample was collected on July 23, 2010 and was analyzed for Total PCBs. The analytical results for this sample, which were included in CRA's November 5, 2010 letter, were non-detect for PCBs, confirming that PCBs are not present in the groundwater at the Site.

A second shallow boring was installed adjacent to the east exterior wall of the Shredder Building, approximately 10 feet to the east of the east sump. Given the concern for nearby buried utilities, this boring was advanced utilizing a hand auger to a depth of five feet below the ground floor level. This boring was advanced into the clay and was dry, even though water was observed in the sump excavations. The boring was closed with soil cuttings and bentonite grout.

3.0 CHARACTERIZATION - 40 CFR 761.61(A)(2)

From June through October 2010, site characterization activities were completed in the shredder building to identify the source of PCBs detected in water and oil samples obtained from two floor sumps. The analytical results of the sampling activities conducted by CRA, SHA and SUNPRO were provided in CRA's November 5, 2010 letter. Figure 1 presents the Site location and Figure 2 presents the Site plan.

Site characterization activities within the shredder building were initiated in response to the detection of PCBs in waste oil. The concentrations of PCBs in the oil samples from the floor sumps have ranged from 4.4 milligrams per kilograms (mg/kg) to 32 mg/kg. The PCB concentrations in the samples from the oily water beneath the floating oil in the floor sumps were significantly lower, ranging from <0.0005 milligrams per liter (mg/l) to 0.065 mg/l.

Nine additional samples of oil and grease were collected from various surfaces within the shredder building, including the first floor surface, the overhead beams on the first floor, second floor surface drip pans beneath a natural gas engine, and insulation on the walls and overhead beams in the second floor. The concentration of PCBs in these samples ranged from 0.44 mg/kg and 11 mg/kg. In addition, PCB were detected in two wipe samples obtained from the second floor at concentrations of 18 micrograms per 100 square centimeters (ug/100 cm2) and 28 ug/100 cm2, as well as in a sample of process water at 0.028 mg/kg. The PCB concentrations in 4 insulation samples obtained from the second floor ranged from non-detect to 14 mg/kg. Overall, the concentrations of PCBs in these samples varied, with no apparent trend or distribution that identifies the location of a PCB source.

A reconnaissance of the shredder building identified the following equipment from which oil could potentially accumulate in the floor sumps:

- Natural Gas Engine #1
- Natural Gas Engine #2
- Engine Starter
- Drive Unit For Shredder
- Air Compressor
- Hydraulic Power Unit
- Bearing Oil Pump #1
- Bearing Oil Pump #2
- Oil Drip Pan for Evaporator
- Oil Drip Pan for Oil Pump
- Oil Drip Pan for New Oil Storage Area

The oil from each of the above pieces of equipment was sampled, and PCBs were not detected in these 11 oil samples. No other potential sources of PCB concentration have been identified. The data suggests that residual PCB contamination remains in porous surfaces inside the shredder building from either a former episodic event or from a former piece of equipment.

In summary, the following is a listing of the characterization sample results and actions taken prior to undertaking the self-implementing cleanup as proposed in CRA's letter dated November 5, 2010 at the Shredder Building:

1. On June 18, 2010, SHA samples ground floor sumps after PCBs discovered in oil removed from the oil/water separator. PCB level in sump oil layer is 25 ppm.
2. On June 28, 2010, SHA samples oil from equipment in the shredder building. All samples are ND for PCBs.
3. On June 30, 2010, SHA samples oil layer in building sumps. Total PCBS are 20 and 28 ppm.
4. On July 6, 2010, CRA cores through lower level concrete floor and collects samples of soil (7 total) from below ground slab. Total PCBs (in ppm) for the seven soil samples are 0.5, ND, 0.2, 1.3, 4.5, ND and ND.
5. On July 13, 2010 the two ground floor sumps are removed by CRA. The old sumps were constructed as blind (no discharge, not connected to anything) but had become porous due to corrosion.
6. On July 14, 2010, CRA collects post-excavation samples of soil from excavated sump walls and floors on July 13, 2010. Total PCBs (in ppm) for wall and floor samples are 0.67, 0.93, 0.34 and ND.
7. City Scrap reconstructs new blind floor sumps.
8. On July 23, 2010 a shallow well is constructed outside of the shredder building- Well remains dry and is therefore not sampled.
9. On July 23, 2010, oily water in ground floor sumps is sampled and analyzed for PCBS. Total PCBs are ND and 0.0011 ppm.
10. On August 12, 2010, Oily water in the ground floor sumps is sampled and analyzed for PCBs. Total PCBS (in ppm) are 6.2 and 0.052 for the oil and 0.0015 and 0.018 for the water layer.
11. On August 18, 2010 the grit chamber and oil water separator are pumped out and steam cleaned.
12. On September 7, 2010 CRA and SHA collect samples from drip pans, 2 sumps, oil on floor, greasy grime on ceiling beams. Total PCBs (in ppm) for oil layer in the sump is 5.28 and is ND for the equipment. The three greasy grime samples have Total PCBs of 14, 12 and 5. The oil sample from an oil drip from upper floor has Total PCBS of 0.44 ppm.
13. On September 21, 2010, a limited cleansing of the shredder building ground floor and second floor using degreaser and steam cleaner was undertaken.

14. On September 29, 2010, CRA and SHA sample oily water from the two ground floor sumps, along with grease from second floor motor support stands. Total PCBs for oil in sumps is 17 and 10 ppm. Total PCBs for grease on a second floor motor support is 13 ppm.
15. On October 6, 2010, CRA samples wall insulation, engine crankcases and other oil containing devices. (The natural gas expansion tanks are examined for oil residue, but none is found). Total PCBs for the oil containing devices are ND. The wall insulation has 3.5 ppm.
16. On October 12 , 2010, SHA collects samples of second floor oil drip pans, motor supports, concrete wipe samples and oil drips from second floor. Results for the oil samples are 1.2, 2.2, ND, 5.9, 11 and 4.4 ppm. The two wipe samples had results of 28 and 18 ug/100 cm2.
17. On October 29, 2010, CSSC collects samples of the wall insulation on the second floor from the south wall, near the east engine and near the west engine with analytical results for these three samples are 14 ppm, 4.4 ppm and non-detect, respectively.

Numerous samples of oils, grease and grime in the shredder building had been collected and analyzed, with several samples continuing to have positive PCB concentrations. Both CRA, representing the owners of the property and Sanborn Head Associates, representing the prospective purchaser of the property, have examined the building and had concurred that all likely potential sources of the PCBs have been sampled and analyzed with no ongoing new source of the PCBs becoming identified.

When the excavation activities were completed some soil staining and a limited amount of oil like liquid were observed in the excavations. Although the exact amount of oil present below the ground floor slab is unknown, it is believed that any such liquid would be trapped by the buildings below ground, foundation walls. This belief is further validated by the absence of any liquids in a shallow well that was constructed adjacent to the outside of the shredder building's, east wall and the absence of PCBs in groundwater samples recently collected from on site monitoring wells.

4.0 CLEANING AND ENCAPSULATION

The self-implementing PCB cleanup in the Shredder Engine Building was initiated on November 9, 2010 and was completed on November 20, 2010. The details of the cleanup and encapsulation, along with the post cleanup verification results and waste characterization can be found in a report prepared by SUNPRO dated November 23, 2010 that is provided as Attachment B to this CCS report.

Essentially, SUNPRO cleaned the interior of the Shredder Engine Building, collected verification samples from the non-porous surfaces and then encapsulated the porous surfaces with two layers of epoxy sealer, with each layer having a different color.

Cleaning of the interior of the shredder building required the shredder operations to be shutdown and certain components disabled or removed off of the floors. All work was conducted in accordance with site-specific health and safety plan (HASP) for the project, specifically for employees and subcontractors, in accordance with OSHA requirements

Preparation Steps

- Shut power off to the shredder building.
- Placed poly sheeting over electrical panels and controls to protect from water damage.
- Removed all loose equipment & materials from the floor areas.
- Removed liquids from the 2 lower level building sumps and containerized for disposal.
- Hand wiped visible oil from the engines, hoses, compressors, hydraulic system, and above-grade structures.
- Used mechanical scrapers to remove gross oil and grit from the floor areas.

Walls & Ceiling (Second Floor Area)

- The walls are metal siding attached to the steel building frame. Portions of the siding and building frame were covered with a sprayed on insulation material that contained low levels of PCBs. To ensure the removal of the PCBs from these surfaces, all of the insulation on the second floor was removed which resulted in bare metal surfaces.
- The insulation was removed using mechanical scrapers and containerized for disposal.
- HEPA vacuum cleaned the surfaces and verified removal with wipe samples of remediated surfaces.
- In accordance with 40 CFR 761 subpart p, verification wipe sample procedures were followed, including the preparation of a systemic grid layout out of the remediated wall and ceiling areas. Wipe sampling was performed utilizing a 10 square-foot characterization grid, with an estimated 25 grid locations. A random number generator was used to identify grids selected for verification wipe sampling. Wipe samples were collected at 14 grid locations (plus 1 field blank) and sent to Phoenix Environmental Laboratories Inc., located in Manchester, Connecticut. Wipe sample analysis was conducted using EPA Method 8082.
- In accordance with 40 CFR 761.61 (a) 4 (ii) for non-porous surfaces, the surfaces were cleaned to a level of less than 10 ug/ 100 cm2 (all samples were non-detect).

Walls (First Floor Area)

- In accordance with 40 CFR 761.30 p (ii) A, the procedures for cleaning the porous walls are found in 40 CFR 761.375. For the lower level walls, all walls were double washed using Citri-kleen (solvent emulsion).
- All of the walls received a final rinse utilizing clean water.
- Once the walls were dry, the surfaces were covered with a double layer of solvent resistant and water repellant coating per 40 CFR 761.30p (iii) A (1). To accomplish this, sealer made by General Polymers was used. The applications consisted of a clear coat sealer (~1 mil) followed by two coats of contrasting colored, high solids epoxy encapsulant (~ 3.5 mils per layer).

Floors Procedures

- In accordance with 40 CFR 761.30 p (ii) A, the procedure for cleaning the porous concrete floors is found in 40 CFR 761.375. The procedure consisted of a complete double wash of floor surfaces using Citri-kleen (solvent emulsion).
- All of the floors received a final rinse utilizing clean water.
- Once dry, the floors were covered with a double layer of solvent resistant and water repellant coating per 40 CFR 761.30p (iii) A (1). This was accomplished by application of General Polymers products consisting of a clear coat sealer (~1 mil) followed by two coats of contrasting colored, high solids epoxy encapsulant (~ 3.5 mils per layer).

In accordance with 40 CFR 761.30 p (iii) B, once the coatings fully cured, the Large PCB Mark M_L placards, as described in 40 CFR 761.45 (a) will be attached with mechanical fasteners to each wall approximately five feet above the finished floor levels.

During cleaning operations, all spent liquids were collected and containerized, including the liquids that accumulated in the lower level sumps. The spent fluids, used PPE and cleaning materials were containerization in DOT approved shipping containers (metal drums for the liquids, and super boxes for the solids). The waste material will be disposed of off site as PCB waste in accordance with the requirements of 40 CFR 761.378 and 40 CFR 761.79 (g). A copy of the waste manifests will be forwarded under separate cover once the waste has been shipped from the Site.

5.0 POST CLEANUP CARE

Following the cleaning and sealing, a minor amount of oil and water was observed to seep into the first floor from several limited locations. Oil absorbent pads were used to contain the oil that was seeping from the first floor ceiling, through several small voids in the concrete walls, and from cracks in the floor. Oil that emits from the voids and cracks in the concrete or from ceiling penetrations will continue to be collected and managed according to the "as found" concentrations of PCBs. With the epoxy coating covering the concrete surfaces and the source of PCBs removed, the oil seepage rates will dissipate over time. In the near-term, oil absorbent pads along with aggressive house cleaning will be limit the potential for human exposure and the potential for comingling with wastewater and waste oil generated during routine use of the decontaminated facility. Spent absorbent oil pads from the lower level of the shredder engine building will be placed in DOT approved sealed metal containers marked as PCB waste.

In accordance with 40 CFR 761.30 p (iii) B, the Large PCB Mark M_L placards, as described in 40 CFR 761.45 (a) will be attached to each wall approximately five feet above the finished floor level. Should these placards wear out, they will be replaced. The facility will include inspection of the signs as part of routine monthly facility compliance inspections. As part of the inspection process, any damage to the surface coating that exposes the underlying coating will be noted, and repair to the surface coatings will be implemented, prior to the next monthly inspection.

6.0 INSTITUTIONAL CONTROLS

As part of the Remediation Complete Report submitted to USEPA on February 4, 2010, a copy of the deed restriction that was prepared and recorded at the Summit County Registers Office for the Site as required under 40 CFR 761.61 (a) (8), was included in that report. None of the self-implementing PCB cleanup work completed in the shredder engine building or investigative results under taken since the filing of the deed restriction required any changes or modifications to the deed restriction on file.

7.0 CERTIFICATION STATEMENT

Attachment A to this letter is a signed certification statement prepared in accordance with 40 CFR 761.61 (a) (3) (E) that identifies that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrument/ chemical analysis procedures used to assess or characterize the PCB contamination at the Site are on file at the location designated in the certificate.

7.0 CERTIFICATION STATEMENT

Attachment A to this letter is a signed certification statement prepared in accordance with 40 CFR 761.61 (a) (3) (E) that identifies that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrument/ chemical analysis procedures used to assess or characterize the PCB contamination at the Site are on file at the location designated in the certificate.

If you have any questions, please do not hesitate to contact us at your convenience.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Jeroen Winterink

JAW/po/02
Encl.

cc: Peter Ramanauskas (USEPA Region V)
Ken Bardo (USEPA Region V)
Neal Weinfield (Greenberg Traurig, LLP)
Steve Katz (City Scrap & Salvage)
Randy Katz (City Scrap & Salvage)
Henry Cooke (CRA)
Paul Gallagher (SHA)

Attachments:
Figure 1- Site Location
Figure 2- Site Plan
Figure 3- Sample Locations
Attachment A - Copy of Owner's Certification Statement
Attachment B – SUNPRO Report

FIGURES

STATE OF OHIO)
) SS
COUNTY OF STARK)

AFFIDAVIT

Salvatore J. Miraglia, Jr., being duly sworn, deposes and says on oath as follows:

1. I am an officer of TSB Metal Recycling, LLC (hereinafter referred to as "TSB"), and I am authorized and empowered to make and I do make this Affidavit on behalf of said TSB. The averments herein are likewise made as though for and by said TSB.

2. City Scrap & Salvage Company (hereinafter referred to as "CSSC") is the owner of the facility located at 785 Flora Avenue, Akron, Ohio (hereinafter referred to as the "Facility Property").

3. I am aware of the letter dated August 14, 2009, from the United States Environmental Protection Agency (hereinafter referred to as "USEPA") to CSSC (hereinafter referred to as the "Letter"), a photocopy of which Letter is attached hereto as Attachment 1.

4. Effective as of the close of business on December 31, 2010, TSB intends to acquire ownership of the Facility Property from CSSC.

5. I am aware of the provisions of the risk-based disposal conditional approval granted by USEPA to CSSC relative to the Facility Property.

6. Upon the transfer by CSSC to TSB of the legal title to the Facility Property, TSB will abide by the deed restrictions recorded prior to the date hereof pursuant to Section F (Property Use and Restrictions) of the August 14, 2009 risk-based conditional approval granted by the USEPA, unless and until additional investigation and/or cleanup is performed which demonstrates that such restrictions are no longer required under applicable environmental laws.

IN WITNESS WHEREOF, the Affiant has signed this Affidavit this 15th day of December, 2010.

Salvatore J. Miraglia, Jr.
On behalf of TSB Metal Recycling, LLC

Subscribed and sworn to before me this 15th day of December, 2010.

Tori K. Meadows
Notary Public

«AK3:1050309_v1»

NOTARIAL SEAL STATE OF OHIO

TORI K. MEADOWS
Notary Public, State of Ohio
My Commission Expires 09-28-2013

City Scrap & Salvage Co. Inc of Akron

P.O. Box 3718 Akron, Ohio 44314 (330) 753-5051 FAX (330) 753-9288

December 16, 2010

Jose G. Cisneros
Chief, Remediation and Reuse Branch
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Margaret M. Guerriero
Director, Land and Chemicals Division
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: 785 Flora Avenue, Akron, Ohio

Dear Mr. Cisneros and Ms. Guerriero:

City Scrap & Salvage Company ("CSSC") is the owner of the facility located at 785 Flora Avenue, Akron, Ohio (the "Facility Property"). In accordance with the requirements set forth by the United States Environmental Protection Agency ("USEPA") in its letter to CSSC dated August 14, 2009, a photocopy of which letter is attached hereto for reference, CSSC is required to:

> "At least 10 working days before such conveyance, CSSC must submit to EPA a notarized affidavit signed by the intended new owner or responsible person that states that such person is aware of and shall abide by the provisions of the risk-based disposal conditional approval granted to CSSC for this facility."

For your reference, I have also enclosed the Deed Restriction which has been recorded with regard to the Facility Property under Instrument No. 55680552 in the Recorder's Office, County of Summit, State of Ohio.

Consistent with the requirements imposed by the USEPA, CSSC hereby encloses an Affidavit signed by Salvatore J. Miraglia, Jr., on behalf of TSB Metal Recycling, LLC ("TSB"). CSSC, as Seller, and TSB, as Buyer, of the Facility Property intend to close the contemplated transaction and convey ownership to the Facility Property effective as of the close of business on December 31, 2010.

If you should have any questions concerning this submittal, please do not hesitate to contact the undersigned.

Sincerely,

Steven M. Katz, President

Encl.

cc: Ken Bardo
Nathan D. Bailey, Esq.
Patrick L. Leddy, Esq.

«AK3:1050582_v1»

THE ABOVE SPACE FOR RECORDER'S OFFICE

Deed Restriction

THIS ENVIRONMENTAL LAND USE CONTROL ("ELUC"), is made this 3rd day of February, 2010, by City Scrap and Salvage Company ("Property Owner") of the real property located at the common address 785 Flora Avenue, Akron, Ohio ("Property").

WHEREAS, 40 CFR 761.61(a)(8) provides for the use of an ELUC as an institutional control in order to impose land use limitations or other requirements related to environmental impacts. The reason for an ELUC is to ensure protection of human health and the environment. The limitations and requirements contained herein are necessary in order to protect against exposure to contaminated soil that may be present on the Property.

WHEREAS, although City Scrap and Salvage Company has performed environmental remediation at the Property, certain residual polychlorinated biphenyl ("PCB") impacts of less than ten parts per million in soil remain at the Property to which this deed restriction applies.

NOW, THEREFORE, the recitals set forth above are incorporated by reference as if fully set forth herein, and the Property Owner agrees as follows:

Section One. Property Owner does hereby establish an ELUC on the real estate, situated in Summit County, State of Ohio and further described in Exhibit A attached hereto and incorporated herein by reference (the "Property"). Attached as Exhibit B is a site map that shows the legal boundary of the Property to which the ELUC applies and the area of the Property in which a concrete cap must be maintained.

Section Two. Property Owner represents and warrants that it is the current owner of the Property and has the authority to record this ELUC on the chain of title for the Property with the Summit County, Ohio Fiscal Office.

Section Three. The Property Owner hereby agrees, for itself, and its grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein, that: (i) the Property

55680552
Pg: 1 of 8
02/03/2010 02:41P
DE 96.00
John A Donofrio, Summit Fiscal Officer

shall only be used for industrial or commercial uses, (ii) the Property shall be fenced with one or more secured points of access, and (iii) a concrete cap shall be maintained in the area of the Property depicted on Exhibit B. The Property Owner and all future owners of the Property will also inspect the integrity of the fence and concrete slab at least annually. The fence will be repaired if needed for security and the concrete slab will be repaired if the slab no longer provides a barrier to the sub surface soils.

Section Four. This ELUC is binding on the Property Owner, its grantees, successors, assigns, transferees and any other owner, occupant, lessee, possessor or user of the Property or the holder of any portion thereof or interest therein. This ELUC shall apply against the Property in perpetuity unless the residual PCB impacts are excavated and disposed of off-site at which time the owner of the Property may prepare and record a release of this Deed Restriction on the chain of title for the Property, but no earlier than thirty days after the excavation and off-site removal of the residual PCB impacts.

Section Five. The effective date of this ELUC shall be the date that it is officially recorded in the chain of title for the Property to which the ELUC applies.

WITNESS the following signatures:

City Scrap and Salvage Company

By: _____

Its: President

Date: February 3, 2010

This instrument prepared by:
David W. Woodburn, Esq.
Buckingham, Doolittle & Burroughs, LLP
3800 Embassy Parkway
Suite 300
Akron, Ohio 44333
(330) 376-5300

STATE OF OHIO)
) SS:
SUMMIT COUNTY)

I, William L. Caplan, the undersigned, a Notary Public for said County and State, DO HEREBY CERTIFY, that Steven M. Katz, personally known to me to be the authorized agent of Property Owner, and personally known to me to be the same person whose name is subscribed to the foregoing instrument, appeared before me this day in person and severally acknowledged that in said capacity he signed and delivered the said instrument as his free and voluntary act for the uses and purposes therein set forth.

Given under my hand and official seal, this 3rd day of February, 2010.

Notary Public

WILLIAM L. CAPLAN, ATTORNEY AT LAW
NOTARY PUBLIC-STATE OF OHIO
MY COMMISSION HAS NO EXPIRATION DATE
SEC. 147.03 R.C.

Exhibit A

The subject property is located in the City of Akron, Summit County, State of Ohio, commonly known as 785 Flora Avenue, Akron, Ohio and more particularly described as:

Parcel #1:Parcel of land situated in the City of Akron, County of Summit, and State of Ohio, being all of Deed recorded in instrument 54056172 located in Tract 2, Lot 10, Coventry Township, and more fully described as follows:

Beginning at the Southwesterly lot corner of Lot #100 as recorded in Plat Book 21, Page 3, being on the North Right of Way of Flora Avenue R/W 50' at a rebar set at the True Point of Beginning of parcel herein described as follows:

Thence S 67°-05'-44" W along the Northerly line of a parcel deeded to Cotter Merchandise Storage recorded in Deed Volume 3578, Page 270, a distance of 313.94' to a rebar set;

Thence N 89°-50'-37" W along said parcel, 720.02' to a rebar found with cap noting #7189;

Thence N 00°-03'-22" E, 50.00' to a rebar found;

Thence in a Northeasterly direction, along the Southerly Right of Way of the railroad, following a curve to the left (counterclockwise), having a radius of 2914.50', a central angle of 20°-25'-16", a chord bearing of N 78°-00'-19" E, a chord of 1033.28' and an arc distance of 1038.77' to a rebar set;

Thence S 00°-38'-17" W along the West line of said Lot #100 a distance of 140.60' to the True Point of Beginning containing 2.479 acres of land and subject to all easements of record.

A call for a 5/8" rebar is a rebar with a green epoxy coating, with a cap noting, "Accurate Tech". Pins called out to be set in the future and said rebar may be replaced by a drill hole, PK nail or spindle as necessary.

This description derived from a field survey made under my supervision and meets the minimum standards as established by the Ohio State Board of Registered Engineers and Surveyors.

Parcel No. 67-60757 Alt Id. 07-00418-97-001.000

Description approved by Tax Maps
Approval good for 30 days from
MC 2-3-2010 TN 4

Parcel #2:

Parcel of land situated in the City of Akron, County of Summit, and State of Ohio, Being all of Deed recorded in Instrument 950187 located in Tract 2, Lot 10, Coventry Township, containing Lot #67 through #70 and Lot #74 through Lot # 100 as shown in the Second Kenmore Allotment recorded in Plat Book 21, Page 3, and more fully described as follows:

Beginning at the intersection of the South line of Wilbeth Road R/W 60' and the West line of 7th Street S.W. at a rebar set;

Thence S 00°-35'-15" W along the West right of way of 7th Street S.W. R/W 50' and the East line of Lot #70, 124.60 feet to a rebar set;

Thence N 89°-15'-45" W along the South line of Lots #68, #69, & #70, 119.85' to a rebar set;

Thence S 00°-35'-15" W along the West line of Lot #73, 124.60 feet to a rebar set;

Thence N 89°-15'-45" W along the North line of Flora Avenue S.W. R/W 50', 280.03' to a rebar set;

Thence S 66°-57'-05" W along said Northwesterly right of way, 850.26' to a rebar set;

Thence N 00°-38'-17" E along the West line of Lot #100, a distance of 140.60' to a rebar set;

The following 3 courses follow the Southeasterly right of way of the Railroad as noted in Deed Instrument 950187, said plan of survey made by Konstantinos:

Thence N 66°-55'-12" E, 655.21' to a rebar set;

Thence N 68°-10'-12" E, 260.00' to a rebar set;

Thence N 64°-53'-12" E, 199.70' to a rebar set;

Thence S 89°-17'-42" E along the South right of way of Wilbeth Road R/W 60', a distance of 158.30 feet to the True Point of Beginning of parcel herein described containing 4.131 acres of land and subject to all easements of record.

A call for a 5/8" rebar is a rebar with a green epoxy coating, with a cap noting, "Accurate Tech". Pins called out to be set in the future and said rebar may be replaced by a drill hole, PK nail or spindle as necessary.

This description derived from a field survey made under my supervision and meets the minimum standards as established by the Ohio State Board of Registered Engineers and Surveyors.

Parcel No. 67-52063 Alt Id. 07-00418-01-006.000

Exhibit B

Attached is a scaled map showing the legal boundary of the Property to which the ELUC applies and the area in which a concrete cap must be maintained.

«AK3:1016305_v3»

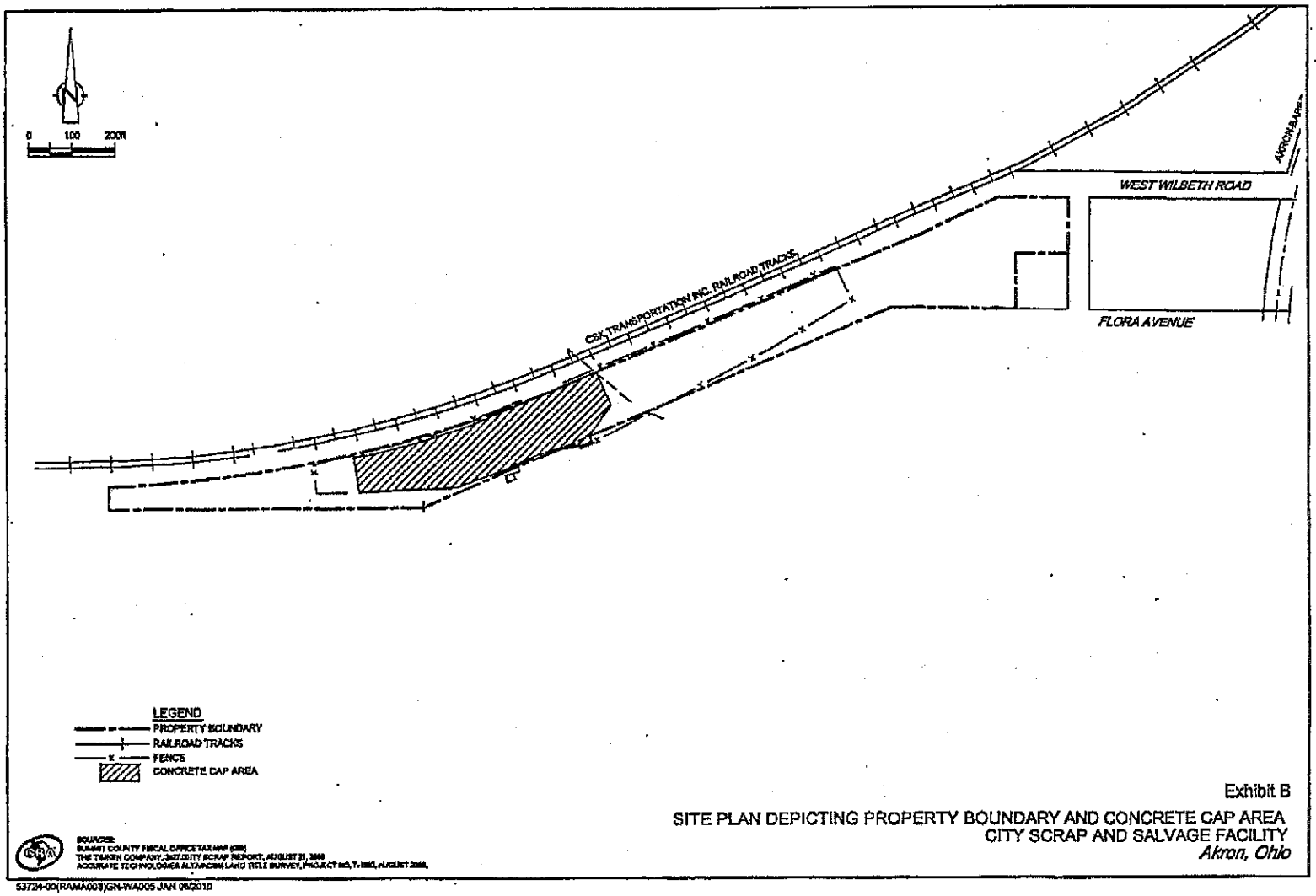


Exhibit B

SITE PLAN DEPICTING PROPERTY BOUNDARY AND CONCRETE CAP AREA
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

53724-00(RAMA003)GN-WA005 JAN 06/2010

Attachment 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

#053724

AUG 14 2009

REPLY TO THE ATTENTION OF: L-8J

VIA E-MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED
AUG 24 2009
CRA INC.
CINCINNATI

Mr. Jeroen Winterink
Conestoga-Rovers & Associates
9033 Meridian Way
West Chester, Ohio 45069

RE: Approval with Conditions for Risk-Based Cleanup and Disposal of PCBs
City Scrap and Salvage Company, Akron, Ohio

Dear Mr. Winterink:

The U.S. Environmental Protection Agency approves the application submitted by Conestoga-Rovers & Associates on August 3, 2009, and revised Figures 4a and 4b of the application e-mailed on August 5, 2009, to cleanup and dispose of polychlorinated biphenyls (PCBs) at the City Scrap and Salvage Company (CSSC) facility located at 611 W. Wilbeth Road in Akron, Ohio.

This Approval allows the cleanup and disposal of PCB remediation waste consisting of surface soil and concrete which was characterized as containing PCBs greater than 1 but less than 100 parts per million (ppm). PCB remediation waste found on-site that contains greater than 10 ppm PCBs will be excavated and disposed off-site. PCB remediation waste found on-site that contains less than 10 ppm but greater than 1 ppm PCBs will either be excavated and disposed off-site or disposed on-site under a minimum 9" concrete cover. All PCB remediation waste located off-site at the perimeter of CSSC property containing greater than 1 ppm PCBs will be excavated and disposed off-site.

This Approval is granted in accordance with 40 C.F.R. § 761.61(c) under which the Regional Administrator may approve a method to sample, cleanup, or dispose of PCB remediation waste if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. The authority to grant such approvals in Region 5 has been delegated to the Land and Chemicals Division Director.

EPA grants this Approval based on our finding that the cleanup of PCB remediation waste at and in the vicinity of the CSSC facility and its off-site disposal, in compliance with the terms and enclosed conditions of this letter, does not pose an unreasonable risk of injury to health or the environment. This Approval is effective as of the date of this letter.

CSSC must complete the risk-based cleanup and disposal in accordance with the approved August 3, 2009, application, revised Figures 4a and 4b of the application, and enclosed conditions of approval. If CSSC deviates from the terms and enclosed conditions of this letter without prior written approval of EPA, it may result in the immediate suspension of this Approval, the commencement of proceedings to revoke this Approval, and/or an enforcement action. In addition, this Approval may be suspended or revoked at any time if EPA has reason to believe that the continued cleanup and off-site disposal of PCB remediation waste from the CSSC presents an unreasonable risk to human health or the environment.

This Approval does not relieve CSSC from the responsibility to comply with all applicable provisions of TSCA and the federal PCB regulations or any other applicable, federal, state or local regulations or permits. This Approval does not preclude EPA from initiating an enforcement action, including seeking civil penalties, for violations of TSCA and the federal PCB regulations.

If you have any questions, please contact Ken Bardo of my staff at 312-886-7566.

Sincerely,

for Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

ENCLOSURE

Conditions of Approval
City Scrap and Salvage Company
611 W. Wilbeth Road, Akron, Ohio

A. Authorized Remedial Action

City Scrap and Salvage Company (CSSC) is authorized to cleanup and dispose of PCBs at its facility located at 611 W. Wilbeth Road in Akron, Ohio according to the Conditions of Approval described below, and the application for risk-based disposal submitted by Conestoga-Rovers & Associates on August 3, 2009, and revised Figures 4a and 4b of the application submitted on August 5, 2009. In the event that the Conditions of Approval are inconsistent with the procedures described in the application for risk-based disposal, CSSC must abide by the Conditions of Approval.

B. PCB Remediation

1. PCB-contaminated soil must be cleaned up to the remediation levels specified in the application for risk-based disposal as summarized and modified below:

a. For the area to be remediated at and in the vicinity of the Shredder Building where a minimum 9" concrete cover will be placed after excavation of PCB-contaminated soil and concrete (see attached Figures 4a and 4b), all post-removal verification samples of soil and concrete from the excavation floors and sidewalls must contain <10 ppm total PCBs.

b. For the area to be partially remediated at and west of the Shredder Building that is not to be covered with a minimum 9" concrete cover (see attached Figure 4a), all post-removal verification samples of soil from the excavation floors and sidewalls in the remediated area must contain <10 ppm total PCBs and the average concentration of total PCBs in surface soil (0 - 2') in the unremediated area (i.e., historical data and post-removal verification samples) is ≤1 ppm total PCBs.

c. For the area to be partially remediated east of the Shredder Building that is not to be covered with a minimum 9" concrete cover (see attached Figures 4b and 4c), all post-removal verification samples of soil from the excavation floors and sidewalls must contain <10 ppm total PCBs and the average concentration of total PCBs in surface soil (0 - 2') in the unremediated area (i.e., historical data and post-removal verification samples) is ≤1 ppm total PCBs.

d. For all off-site areas to be remediated to the north in the vicinity of the CSX railroad tracks and to the south in the vicinity of Flora Avenue, all post-removal

verification samples of soil from the excavation floors and sidewalls must contain ≤1 ppm total PCBs.

2. In Figure 4b of the application for risk-based disposal, the large excavation at the north property boundary must be extended approximately 5-feet to the south so that the excavation of soil includes sample locations B-464 and B-469, prior to conducting post-removal verification sampling.

3. In Figure 4b of the application for risk-based disposal, conduct a minimum 10-foot by 10-foot excavation of PCB-contaminated soil and post-removal verification sampling at sample location B-259.

4. For proposed additional shallow soil sample locations B-805 to B-815 (see attached Figure 4a), samples will be collected at the time of mobilization. The data will be used to determine and adjust the extent of the excavations, as necessary, to ensure that all soil containing ≥10 ppm total PCBs is excavated and disposed off-site.

C. Disposal of Remediation Waste

Materials contaminated with PCBs must be disposed of off-site as a regulated PCB waste or in accordance with the off-site disposal guidelines specified in the application for risk-based disposal which are consistent with and considered as disposal of PCB remediation waste found at 40 C.F.R. § 761.61(a). The historical in-situ sampling that has been conducted or proposed in the application for risk-based disposal may be used to characterize the materials for off-site disposal

All equipment that comes in contact with the PCB remediation waste must be decontaminated following the procedures found at 40 C.F.R. § 761.79(b) or (c).

D. Inspection and Maintenance

The minimum 9" concrete cover to be placed in the vicinity of the Shredder Building must be inspected at least once per year for evidence of cracks, settlement, or other effects that could impair the integrity of the cap and allow for human exposure to underlying soil contaminated with total PCBs >1 ppm. Repairs shall begin within 72 hours of discovery for any breaches which would impair the integrity of the cap and potentially pose a risk to workers.

E. Well Abandonment

When determined by CSSC to be no longer necessary, monitoring wells MW-103, MW-104, MW-205, and MW-206 shall be abandoned and properly sealed in accordance with Ohio Administrative Code 3701-28-07.

F. **Property Use and Restrictions**

Within 45 days of completing the remediation required under this conditional approval, CSSC must record, in accordance with State law, a notation on the deed to the property or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:

1. that the land has been used for PCB remediation waste disposal.
2. of the existence of the concrete cover and the requirement to maintain the concrete cover.
3. of the existence of the fence and the requirement to maintain the fence and keep the gates locked.
4. of the applicable cleanup levels left at the facility, both inside the fence and under the concrete cover.
5. of the land use restrictions for industrial and commercial purposes only.

G. **Remediation Complete Report**

Within 60 days of completing the remediation under this conditional approval, CSSC must submit to EPA:

1. an analysis of post-removal verification sample results and demonstration that the areas on the property not covered with concrete have average total PCB concentrations remaining in surface soil <1 ppm, and the area covered with concrete has total PCB concentrations remaining in surface soil <10 ppm.
2. a description of the final specifications of the concrete cover, including a map showing its exact location.
3. a summary of the off-site disposal activities.
4. a discussion of the implementation of any EPA-approved modifications to this conditional approval.
5. a certification, signed by the owner, that it has recorded the notation on the deed for property use and restrictions.

H. **Change of Ownership**

CSSC must notify EPA within 20 working days of any conveyance of ownership or responsibility of the facility property. Such notice must include the date of the intended conveyance, and the name, address, and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice must also include the name of a contact person.

At least 10 working days before such conveyance, CSSC must submit to EPA a notarized affidavit signed by the intended new owner or responsible person that states that such person is

aware of and shall abide by the provisions of the risk-based disposal conditional approval granted to CSSC for this facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 1 2 2010

REPLY TO THE ATTENTION OF:
LU-9J

Mr. Steve Katz
President
City Scrap and Salvage Company
611 W. Wilbeth Road
Akron, Ohio 44314-1735

Re: City Scrap and Salvage Co Cleanup of Poychlorinated Biphenyls (PCBs)

Dear Mr. Katz,

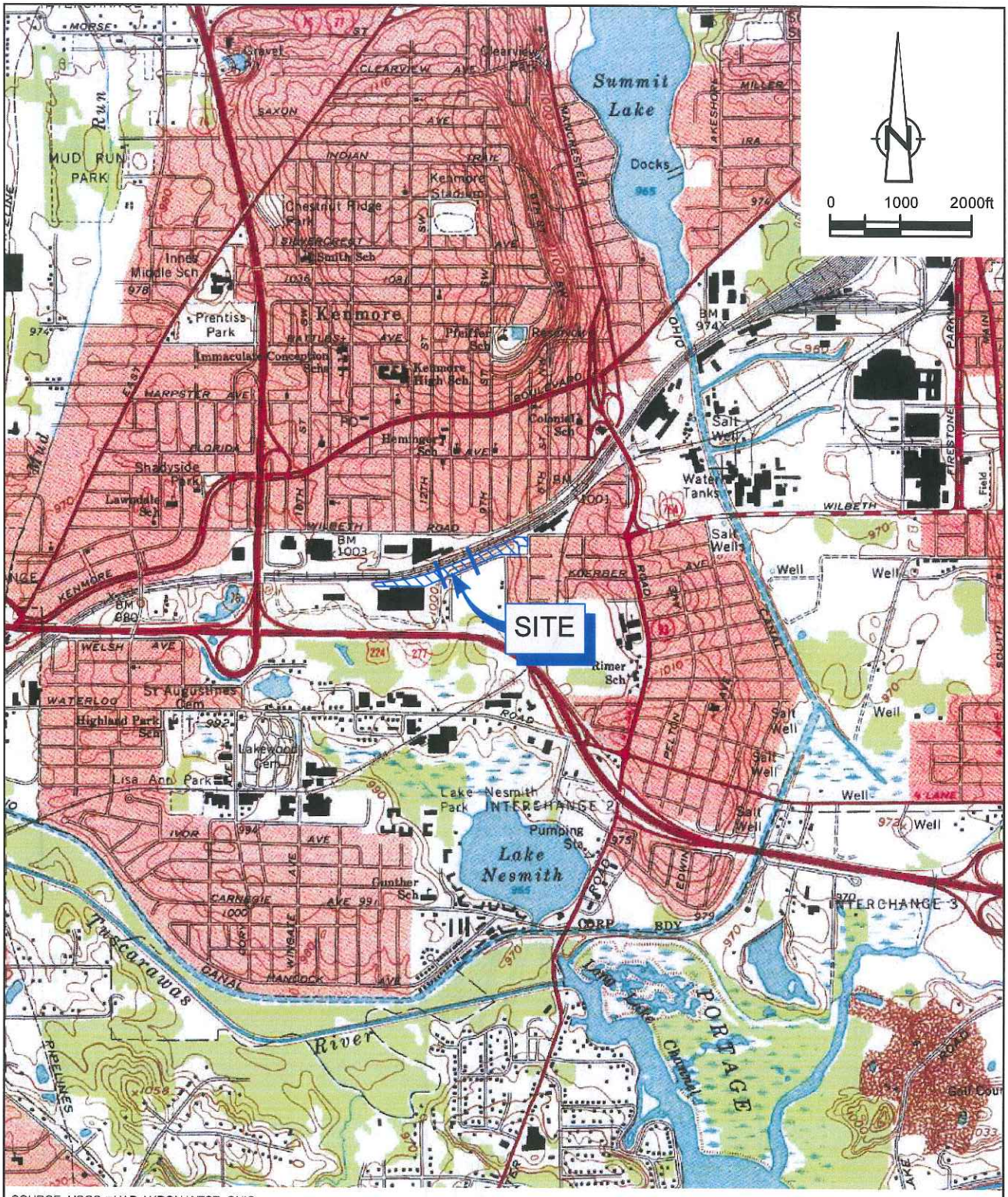
Thank you for your November 30, 2010 submittal of a Cleanup Completion Summary Report which describes the work that was completed under your self-implementing PCB cleanup of the Shredder Engine Building at the City Scrap and Salvage facility at 611 W. Wilbeth Road in Akron, Ohio. Based on our review of your report, we have determined that it adequately documents your compliance with the regulatory requirements for self-implementing PCB cleanups under 40 CFR 761.61(a). Your contractor cleaned the interior of the Shredder Engine Building, collected verification samples from the non-porous surfaces in accordance with 40 CFR Subpart P, and then encapsulated and PCBs remaining in porous surfaces with two layers of epoxy sealer, with each layer having a different color per 40 CFR 761.30(p). PCB-contaminated solids were disposed of at the TSCA permitted EQ-Wayne Disposal facility in Belleville, Michigan.

Because residual PCB contamination exists at the site, all conditions of EPA's PCB remedial approvals and other applicable requirements of TSCA and its regulations will continue to apply to the site after any transfer in ownership.

Thank you for your cooperation. Please contact me at (312) 886-0987 if you have any questions.

Sincerely,

George J. Hamper
Chief, Corrective Action Section 2
Remediation and Reuse Branch



SOURCE: USGS □UAD AKRON WEST, OHIO.

figure 1

SITE LOCATION MAP
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

53724-00(HEDM001)GN-WA001 NOV 30/2010

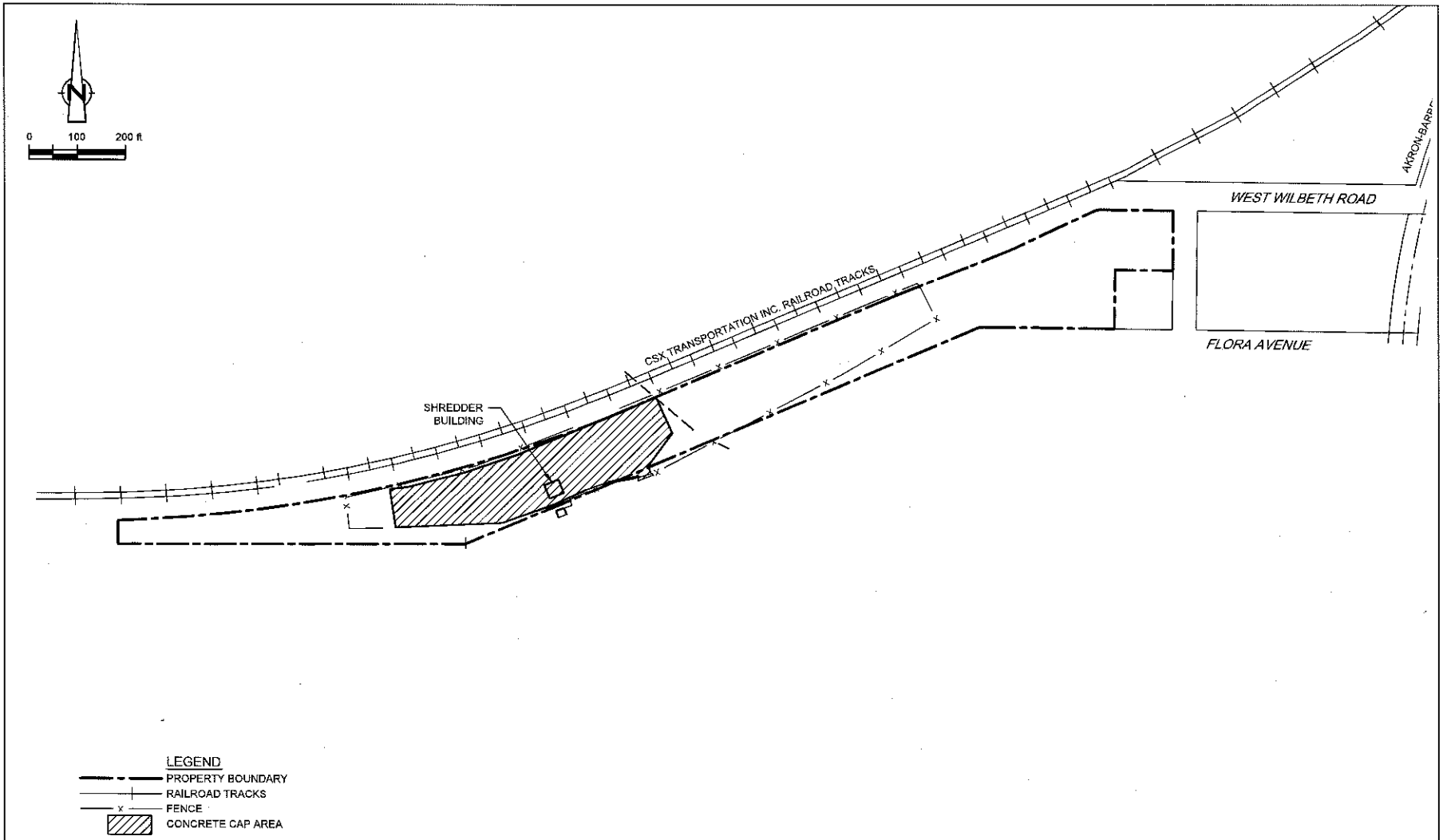


figure 2

SITE PLAN
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

SOURCES:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 2927.00 ITY SCRAP REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY, PROJECT NO. T-1593, AUGUST 2008.

53724-00(HEDM001)GN-WA002 NOV 30/2010

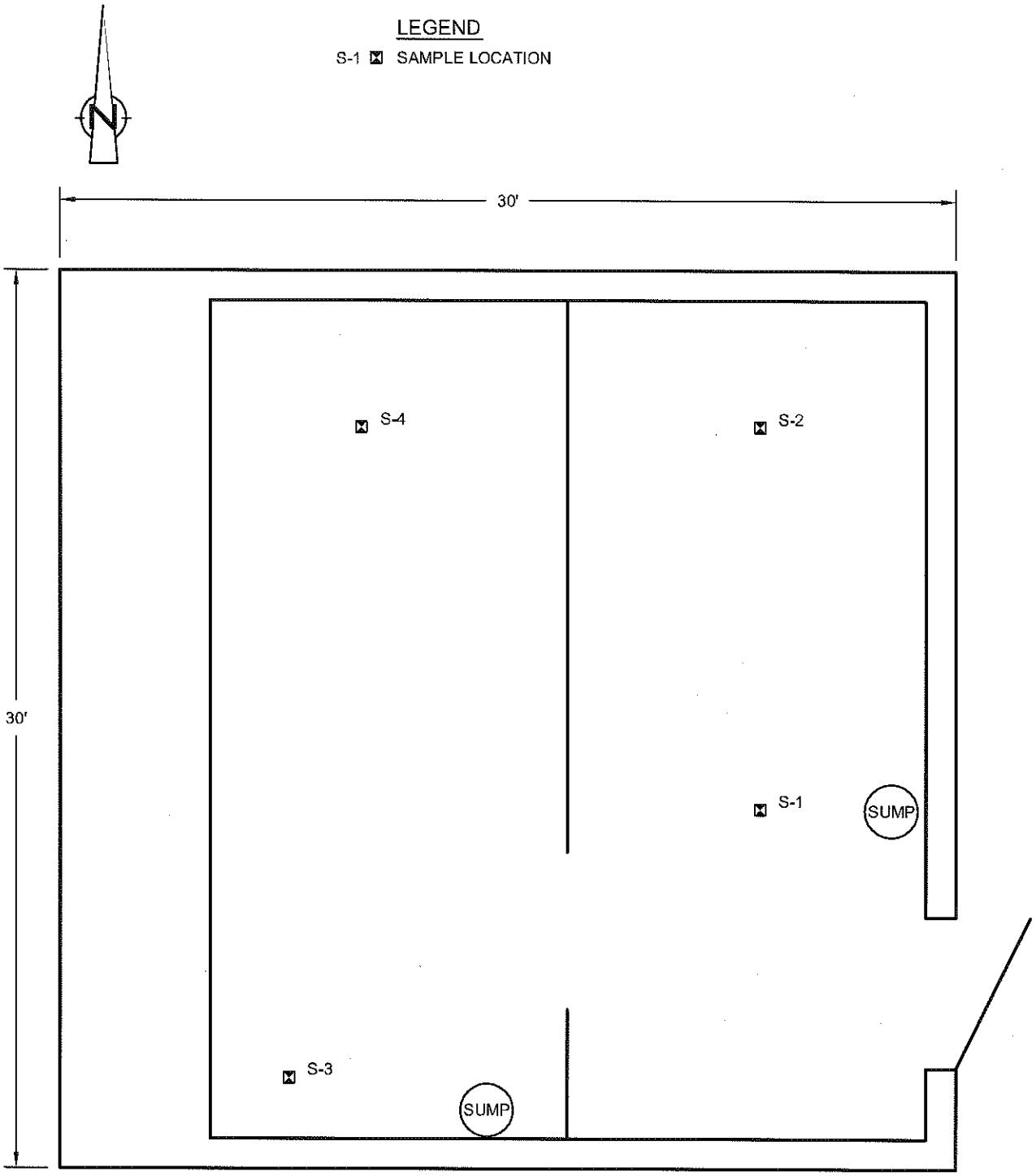


figure 3

SHREDDER BUILDING - GROUND LEVEL
CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

53724-00(HEDM001)GN-WA003 NOV 30/2010

TABLES

TABLE 1
ANALYTICAL RESULTS SUMMARY
SOIL SAMPLE RESULTS FOR UNDER CONCRETE SLAB
CITY SCRAP AND SALVAGE
AKRON, OHIO

Sample Location	*Sample Identification*	*Sample Date*	*Sample depth*	*Total PCBs (1) mg/kg*
S-1	S-53724-070610-JW-001	7/6/2010	(0.5-1.0) ft BGS	0.475
S-2	S-53724-070610-JW-002	7/6/2010	(0.5-1.0) ft BGS	0.200
S-2	S-53724-070610-JW-003	7/6/2010	(1.0-1.5) ft BGS	0.020 U
S-3	S-53724-070610-JW-004	7/6/2010	(0.5-1.0) ft BGS	4.50
S-3	S-53724-070610-JW-005	7/6/2010	(1.0-1.5) ft BGS	1.33
S-4	S-53724-070610-JW-006	7/6/2010	(0.5-1.0) ft BGS	0.020 U
S-4	S-53724-070610-JW-007	7/6/2010	(1.0-1.5) ft BGS	0.020 U
west sump	S-53724-071410-GL-001	7/14/2010	(3.0-3.1) ft BGS	0.3400
west sump	S-53724-071410-GL-002	7/14/2010	(1.0-3.0) ft BGS	0.020 U
east sump	S-53724-071410-GL-003	7/14/2010	(3.0-3.1) ft BGS	0.6700
east sump	S-53724-071410-GL-004	7/14/2010	(1.0-3.0) ft BGS	0.9300

Notes:
"u" - indicates that the sample result is non-detect, associated value is detection limit

"1" - total PCBs is the arithemetic sum of the reported Aroclor concentrations, or if non-detect it is the method detection level

ATTACHMENT A

CERTIFICATION STATEMENT

CERTIFICATION STATEMENT

We, the undersigned, hereby certify that, in accordance with 40 CFR 761.61 (a) (3) (E) all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrument/ chemical analysis procedures used to assess or characterize the PCB contamination at the Site are on file at the location designated below.

Location of documents: Consultant's office in West Chester, Ohio

On Behalf of Owner	On behalf of Consultant
Owner: City Scrap And Salvage	**Consultant: Conestoga-Rovers & Associates**
Representative: STEVE KATZ	**Representative: Jeroen Winterink**
Signature:	**Signature:**
Address: 765 Flora Avenue **Akron, Ohio**	**Address: 9033 Meridian Way** **West Chester, Ohio 45069**
Date: 11-23-10	**Date: November 23, 2010**

ATTACHMENT B

SUNPRO REPORT

CONFIDENTIAL

PCB REMEDIATION SERVICES
SHREDDER ENGINE HOUSE

PROVIDED FOR
CITY SCRAP & SALVAGE COMPANY
611 W. WILBETH ROAD
AKRON, OH

SUNPRO

7640 Whipple Avenue N.W.
North Canton, Ohio 44720
24 Hour (800) 488-0910

FINAL PROJECT REPORT

PCB REMEDIATION SERVICES
SHREDDER ENGINE HOUSE

PROVIDED FOR

CITY SCRAP & SALVAGE COMPANY
611 W. WILBETH ROAD
AKRON, OHIO

SUNPRO, INC.
PROJECT NC105252

NOVEMBER 2010

COPY 1 of 2

REVIEWER

SUNPRO

24-Hour Phone: 330-966-0910
Fax: 330-966-1954
www.sunproservices.com

DATE: November 23, 2010

TO: Mr. Randy Katz
President
City Scrap & Salvage Company
611 W. Wilbeth Road
Akron, OH 44314

RE: Final Project Report
PCB Remediation – Shredder Engine House

Dear Mr. Katz:

Please find enclosed your copy of the final report for the PCB remediation services conducted at the Shredder Engine House at your Akron, Ohio facility.

This report is for the exclusive use of City Scrap & Salvage Company. Any unauthorized duplication or use of this report by others is carried out at their sole risk.

Services performed by SUNPRO, Inc. for this project have been conducted in a manner consistent with commonly accepted practices of the environmental industry. The information presented in this report is based upon the collection and analysis of a limited number of samples. It is possible that areas not sampled or evaluated as part of this project may contain contaminants above regulatory limits or that other contaminants may be present at the site. No warranty, expressed or implied, is made.

It was certainly our pleasure to be of service to you on this project. If we can be of further assistance in answering any questions or in providing additional services, kindly contact myself or Glenn King, at the SUNPRO 24-HOUR HOTLINE: 330-966-0910.

Sincerely,

Ken Kozak
Corporate Accounts Manager
SUNPRO, Inc.

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY

At the request of City Scrap & Salvage Company (CSSC), SUNPRO was contracted to perform removal of PCB contaminated insulation from the shredder engine house building and remediation of impacted concrete floors and walls inside the first and second levels. The remediation was performed in accordance with U.S. EPA's 40 CFR Parts 750 & 761 Disposal of Polychlorinated Biphenyls (PCB's); Final Rule effective August 28, 1998. The remediation activities included removal and disposal of impacted insulation from the walls and ceiling beams on the second level and double scrub wash cleaning of the first floor walls as well as the floors of both levels. Subsequent to the scrub wash cleaning, the identified concrete surfaces were double layer encapsulated in accordance with 40 CFR 761.30(p), which essentially postpones the remediation. To remain in compliance with the regulations, the concrete surface encapsulation must be maintained and the site requires labeling as PCB to visually identify the need for future remediation.

2.0 SITE SERVICES

Background

SUNPRO was contracted by CSSC in November of 2010 to perform a double scrub wash cleaning and double layer encapsulation of the accessible 1st and 2nd level concrete floors at the Shredder Engine House building. Additionally, the 1st floor wall areas were also identified for double scrub wash cleaning and double layer encapsulation. Further, samples obtained from the wall and ceiling insulation on the second level identified PCB levels above 1.0 ppm at two of three locations. Instead of further delineating the contamination, SUNPRO was contracted to perform removal of the insulation followed by confirmation sampling of the underlying steel surface.

The second level floor of the Shredder Engine House Building measures approximately 30' x 30' with a 12' high ceiling and contains two Waukesha engines mounted on the concrete floor. The floor exhibited a heavy layer of grease and oil with several conduits leading to the ground level. Wipe sampling by others identified PCB levels of 18 and 28 ug/100 cm^2 from the floor area. The east and south walls, as well as the ceiling beams were coated with a non-asbestos spray-on type insulation.

The ground level floor is divided into two rooms, each measuring approximately 15' x 30'. Unlike the upper level, the concrete floor was not covered with grease; however oil and water were present across much of the floor. Sumps, estimated to be the size of 5-gallon buckets are located near the southeast corners of each room, with both sumps being full of oil/water. Various areas of the concrete walls exhibited oil staining with residual oil visible. There are also numerous locations across the ceiling where oil drips from conduits and bolt mounts are apparent. The oil is believed to be originating from the operations on the upper level and dripping down through the concrete and floor penetrations. Limited concrete core sampling by others indicated that PCB levels of the floor were below 1.0 ppm.

Site Activities

November 8, 2010

SUNPRO mobilized to the site to initiate remediation activities. The movable equipment from both floors had already been relocated by CSSC personnel and the engines were covered with tarps. The SUNPRO project manager conducted a health and safety briefing reviewing the site specific health & safety plan with all employees. A non-hazardous cleaning solvent was applied to the upper level floor to initiate breakdown of the grease. The floor area was then covered with a double layer of poly sheeting. Additional containment and collection areas for the insulation were constructed with poly sheeting. The removal of the insulation commenced, proceeding from ceiling to floor. The removed material was collected and containerized into PCB labeled, DOT rated cubic yard boxes.

November 9, 2010

The removal efforts for the ceiling and south wall were completed on November 9th at which time grid wipe sampling of the exposed steel surfaces was performed. A total of 13 wipe samples were collected from the gridded surfaces. The samples were documented on a chain of custody along with one blank and shipped to the laboratory for PCB analysis. While on site, it was determined that the remaining insulation along the east wall could be

safely removed by de-energizing the electric power to the site.

November 10, 2010

With the power safely locked out, SUNPRO returned to the site on November 10th and performed removal of the insulation from the east wall. Following the removal and containerization of waste, a wipe sample was obtained from the designated grid location, and was subsequently shipped to the laboratory for PCB analysis.

The floor areas were exposed and scraped to remove bulk grease buildup. The floor areas were then scrub washed with a non-hazardous solvent, using mechanical scrubbers in the main areas and hand brushes in the smaller areas. Following the initial scrub wash, the floor was thoroughly rinsed with clean water and vacuumed dry. The wash and rinse solutions were captured and containerized into 55-gallon closed top drums and labeled as PCB.

November 11, 2010

A second scrub wash cleaning was performed on the engine level floor followed by a clean water rinse. The rinse waters were again vacuumed and containerized for PCB disposal. Drying of the vacuumed floor was accelerated through the use of portable heaters and fans. Once the floor was thoroughly dry, a pre-primer tack coat designed to block residual oils and enhance adhesion was applied. The clear pre-primer was allowed to dry and the floor area was subsequently coated with a light gray, two-part, epoxy sealant designed for oily substrates. The site was secured with the epoxy allowed to cure overnight.

November 12, 2010

With the epoxy coating still tacky, SUNPRO initiated scrub wash cleaning of the ground level floor concrete. The electrical panels and outlets were covered with poly sheeting and areas of heavy grease were scraped clean. The walls and floor area of the west room were scrub washed and rinsed utilizing mechanical scrubbers and a hot pressure washer. The fluids were vacuumed, collected and containerized for PCB disposal. The same procedure was performed in the east room followed by a second scrub wash cleaning of both rooms. Water was observed leaking onto the floor at the base of the north wall. A polyurethane base sealant was caulked into the floor/wall gap along the north wall and for approximately ten feet along the east and west walls. The site was secured and the surfaces were allowed to dry overnight.

November 13, 2010

SUNPRO mobilized to the site and began preparation of the 2nd floor for the top coat of dark gray epoxy. A hydraulic oil reservoir was hoisted off the floor with a chain fall to allow for access for the first coat of encapsulant, while a large welder was also moved to allow for initial sealing. Oil drips from the engine equipment were observed at several locations on the initial epoxy layer. The oils were wiped clean using anhydrous absorbents. The epoxy was mixed and applied to the floor surfaces with an anti-slip material being applied to the top surface as the sealing progressed. The areas under the hydraulic reservoir and welder were then sealed with the first layer of light gray epoxy.

Oil drips observed on the floor and walls of the west room on the ground floor were then wiped clean and the pre-primer tack coat was applied to the surfaces. The clear pre-primer was allowed to dry and the floor area was subsequently coated with the light gray high

solids epoxy. The site was secured with the epoxy allowed to cure.

November 15, 2010

Small drips of oil were observed at several places on the floor and walls of the ground floor west room. The oil drips were wiped clean and a small puddle of water was wiped dry at the base of the east side of the north wall. The top coat of dark gray epoxy was mixed and applied to the west room surfaces.

The east room was prepared by wiping up small oil drips and applying the pre-primer tack coat to the floor and wall surfaces. The pre-primer was allowed to dry and accessible areas of the floor and walls were subsequently coated with high solids epoxy.

Additionally, SUNPRO obtained bulk insulation samples from the engine level rollup door and from a stained area of the insulation on the engine exhaust manifold. Both samples were documented on a chain of custody and shipped to the laboratory for PCB analysis.

November 16, 2010

Following a significant overnight rain event and the first day of operation of the shredder engines, numerous small drips of oil were observed at several places on the floor and walls of the ground floor west room. The oil drips were wiped clean and anhydrous absorbent pads were installed at all of the ceiling leak locations. Additionally a small puddle of water was wiped dry along the base of the north wall and approximately 12 feet along the east wall. Some light discoloration of the epoxy was noted where the water was observed.

Absorbent pads were also installed at several ceiling locations in the east room and a puddle of water was wiped along the east wall near the sump. The sumps in both rooms were emptied with the water being containerized for PCB disposal. The top coat of dark gray epoxy was mixed and applied to the previously coated wall sections in the east room, while the floor area and uncoated wall areas were sealed with a layer of fast cure, light gray two-part epoxy. Additionally, the area beneath the hydraulic reservoir and welder on the engine level floor were sealed with the top coat of dark gray epoxy.

November 17, 2010

In the east room, water intrusion was observed along the base of the east wall while an oil seep was noticed along a half-moon shaped floor crack running from the northwest corner of the room toward the sump. The water and oil were wiped up and the sump was vacuumed dry. The floor crack was filled with a polyurethane based caulk. Water was also observed at the north wall of the west room with leakage coming from electrical conduit holes at the west end of the wall. A small puddle was also observed at the middle of the base of the east wall. The water and sump in the west room were also vacuumed dry. Additionally, the conduit wall penetrations were filled with foam and sealed with caulk.

The remainder of the primed walls in the east room were top coated with dark gray epoxy as well as the south end of the floor that had not been impacted by water. Due to the rain forecast, sealing of the remainder of the floor area was postponed.

November 19, 2010

Due to water intrusion from a malfunctioning water line valve on the 2nd floor, final epoxy sealing of the 1st room floor was postponed. Efforts were made to minimize water intrusion

near the east room sump, with a water plug concrete being installed at the floor area around the sump. The floor was raised approximately three inches adjacent to the sump, then leveling with the existing floor at locations approximately five feet away. Discolored top coat areas were lightly abraded with sandpaper and the top coat of epoxy was applied to touch up areas. A collection trough was also installed along the north wall of the west room to aid in collection of residual oil and water.

November 20, 2010

The remainder of the floor in the east room was sealed with the top coat of epoxy with the anti-slip material being applied to the surface. Discolored top coat areas were lightly abraded with sandpaper and the top coat of epoxy was applied to touch up areas. The final coat of epoxy was also applied to the floor surfaces on the 2nd floor beneath the hydraulic unit and large welder.

3.0 ANALYTICAL DOCUMENTATION

SAMPLE LOCATIONS

The confirmation sampling grid for the remediated wall and ceiling surfaces on the second level were developed in accordance with EPA procedures outlined in 40CFR761 Subpart P. The wall surfaces were separated from the ceiling beam surfaces resulting in ten wall sample locations and four beam locations along with one field blank.

The bulk samples obtained from the various insulation materials were selected from random locations exhibiting visible evidence of oil staining.

The grid maps detailing the confirmation sample locations are included in Appendix 1 of this report.

ANALYTICAL RESULTS SUMMARY

All of the confirmation wipe sample results obtained from the remediated walls and ceiling beams were found to be non-detectable at the 1.0 ug level and thus below the 10 ug/100 cm^2 regulatory limit for high occupancy areas. The bulk insulation samples obtained from the engine level rollup door and the exhaust manifold, were found to be non-detectable at the 1.0 and 0.9 mg/kg (ppm) level respectively.

Laboratory analytical results are summarized in Appendix 2.

SAMPLING PROTOCOL

Wipe sampling was performed within a 10 cm x 10 cm area outlined by a disposable template. New disposable gloves were used for each sample. A three inch square gauze pad was saturated with hexane prior to taking the sample. The gauze pad was wiped with a uniform and steady pressure across the sampling area in rows in one direction from top to bottom with eight sweeps covering the entire area encompassed by the template. The gauze pad was then carefully opened and refolded to expose fresh surfaces. The wiping procedure of eight sweeps is then repeated from right to left so that the entire surface encompassed by the template is effectively wiped twice. Each sample was then placed in a pre-cleaned wide mouth glass jar with a Teflon-lined lid, sealed and labeled.

Bulk samples were obtained using clean utensils and new disposable nitrile gloves. All re-useable sampling equipment was decontaminated between samples. Samples were containerized in a pre-cleaned wide mouth glass jar with a Teflon-lined lid, sealed and labeled.

All samples were systematically numbered and labeled with the project number and sequential numeric digits.

SAMPLE IDENTIFICATION

Samples were systematically numbered and labeled with the project number, area location letter and sequential numeric digits. Samples were stored and shipped in sample containers and were kept cool. Chain of custody documents utilized to document sample transfer are included in Appendix 3.

SAMPLE ANALYSIS

Submitted sample analysis was performed by Phoenix Environmental Laboratories Inc. of Manchester, Connecticut. Samples were analyzed using EPA publication SW-846-Method 8082. The laboratory reports are included in Appendix 3.

4.0 HEALTH AND SAFETY

A Site-specific Health and Safety Plan (HASP) was prepared by SUNPRO and reviewed with personnel upon arrival on site and prior to beginning work activities. After review of the Health and Safety Plan, a safety meeting was conducted by the project manager, discussing site-specific hazards as well as City Scrap and Salvage safety requirements. A copy of the HASP is included in Appendix 4.

5.0 WASTE MANAGEMENT

All wastes produced from remediation activities associated with this project were considered to be PCB and were managed as such. Solid wastes, including personal protective equipment, cleanup debris and other contaminated materials were containerized into DOT approved containers. A total of six (6) cubic yard boxes and one drum of PCB solids and eight (8) drums of PCB fluids were generated during this project. The PCB solids will be transported under manifest to the EQ – Wayne Disposal facility in Belleville, Michigan with a scheduled delivery date of November 23, 2010. The eight drums of PCB contaminated liquids will be transported under to the Clean Harbors - Cleveland facility for subsequent transport and disposal at the Clean Harbors - Spring Grove Resource Recovery facility in Cincinnati, Ohio. The planned delivery date is November 24, 2010.

A copy of the waste summary and manifests are included as Appendix 5.

APPENDIX 1

SAMPLE LOCATION DRAWINGS

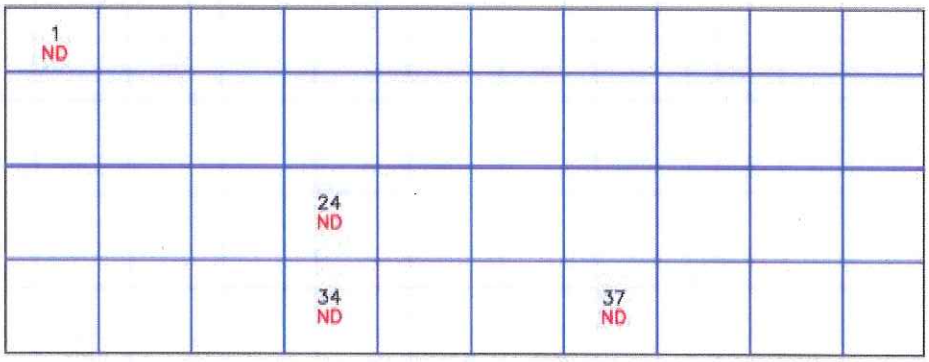
PCB REMEDIATION SERVICES
CITY SCRAP & SALVAGE COMPANY
SHREDDER ENGINE HOUSE

SUNPRO, Inc.
PROJECT #NC105252

NOTE: ND RESULTS ARE <1.0 ug/100 cm^2

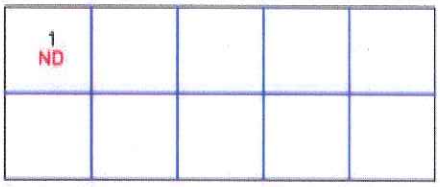
SE CORNER

SOUTH WALL AREA



NE CORNER

EAST WALL AREA



LEGEND

☐ = GRID LOCATION

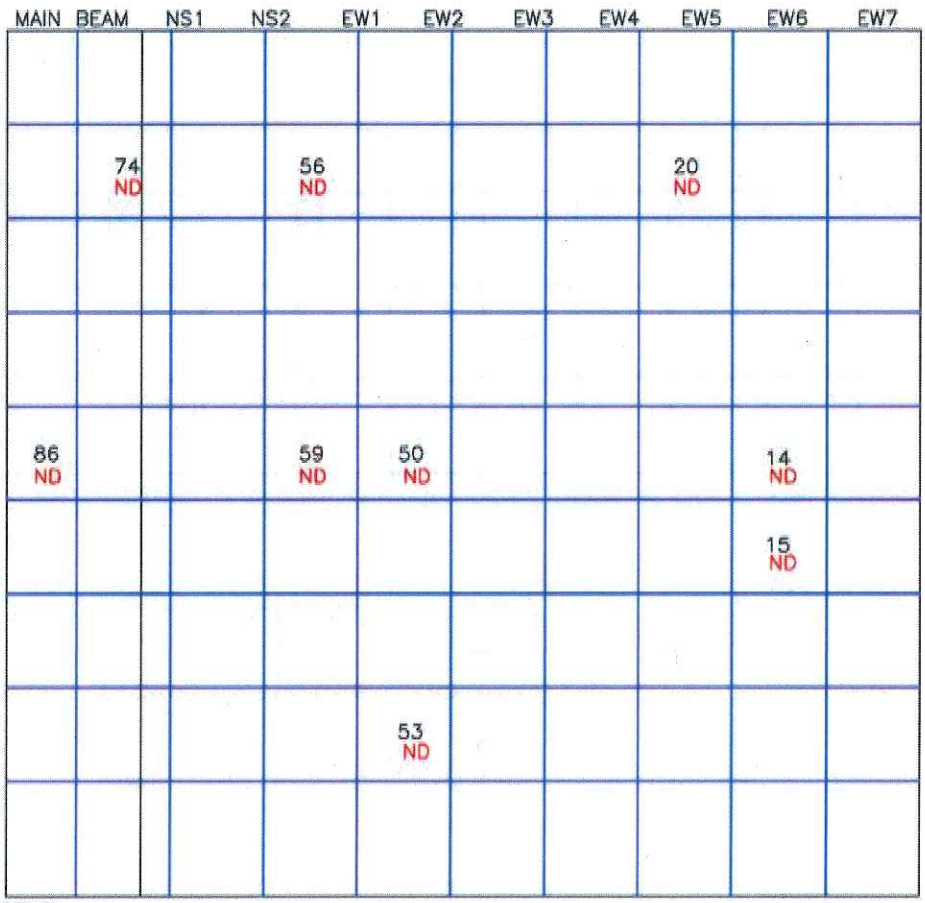
15 = SAMPLE GRID LOCATION

6.5 = SAMPLE RESULTS

NC105252
CITY SCRAP
SHREDDER BUILDING
AKRON, OHIO
DATE: NOVEMBER 22, 2010
APPROX. SCALE: 1"=5'
DRAWN BY: TODD HOLLIS

SUNPRO

NOTE: ND RESULTS ARE <1.0 ug/100 cm^2



LEGEND

□ = GRID LOCATION

15 = SAMPLE GRID LOCATION

6.5 = SAMPLE RESULTS

NC105252
CITY SCRAP
SHREDDER BUILDING
AKRON, OHIO
DATE: NOVEMBER 22, 2010
APPROX. SCALE: 1"=5'
DRAWN BY: TODD HOLLIS

SUNPRO

APPENDIX 2

ANALYTICAL RESULTS SUMMARY

PCB REMEDIATION SERVICES
CITY SCRAP & SALVAGE COMPANY
SHREDDER ENGINE HOUSE

SUNPRO, Inc.
PROJECT # NC105252

CITY SCRAP & SALVAGE COMPANY
SAMPLE RESULTS SUMMARY
SUNPRO PROJECT# NC105252

Initial Site Sampling

Sample #	Sample Date	Sample Location	Sample Type	Result mg/kg (ppm) (unless otherwise noted)
245-1	10/27/2010	2nd floor - ceiling insulation above East Engine	Solid	4.4
245-2	10/27/2010	2nd floor - ceiling insulation above West Engine	Solid	<1.0
245-3	10/27/2010	2nd floor - insulation from South Wall	Solid	14.0

Ceiling and Wall Confirmation Sampling

252-W1	11/9/2010	Wall Grid #1, Location #1	Wipe	ND, <1.0 ug/100 cm^2
252-W2	11/9/2010	Wall Grid #1, Location #24	Wipe	ND, <1.0 ug/100 cm^2
252-W3	11/9/2010	Wall Grid #1, Location #34	Wipe	ND, <1.0 ug/100 cm^2
252-W4	11/9/2010	Wall Grid #1, Location #37	Wipe	ND, <1.0 ug/100 cm^2
252-W5	11/9/2010	Ceiling Grid, Location #14	Wipe	ND, <1.0 ug/100 cm^2
252-W6	11/9/2010	Ceiling Grid, Location #15	Wipe	ND, <1.0 ug/100 cm^2
252-W7	11/9/2010	Field Blank	Wipe	ND, <1.0 ug/100 cm^2
252-W8	11/9/2010	Ceiling Grid, Location #20	Wipe	ND, <1.0 ug/100 cm^2
252-W9	11/9/2010	Ceiling Grid, Location #50	Wipe	ND, <1.0 ug/100 cm^2
252-W10	11/9/2010	Ceiling Grid, Location #53	Wipe	ND, <1.0 ug/100 cm^2
252-W11	11/9/2010	Ceiling Grid, Location #56	Wipe	ND, <1.0 ug/100 cm^2
252-W12	11/9/2010	Ceiling Grid, Location #59	Wipe	ND, <1.0 ug/100 cm^2
252-W13	11/9/2010	Ceiling Grid, Location #74	Wipe	ND, <1.0 ug/100 cm^2
252-W14	11/9/2010	Ceiling Grid, Location #86	Wipe	ND, <1.0 ug/100 cm^2
252-W14	11/10/2010	Wall Grid #2; Location #1	Wipe	ND, <2.0 ug/100 cm^2

Additional Bulk Sampling

252-S1	11/15/2010	Engine Exhaust Manifold Insulation	Solid	ND, <0.9 mg/kg
252-S2	11/15/2010	Roll-up Door Insulation	Solid	ND, <1.0 mg/kg

APPENDIX 3

LABORATORY ANALYTICAL RESULTS

PCB REMEDIATION SERVICES
CITY SCRAP & SALVAGE COMPANY
SHREDDER ENGINE HOUSE

SUNPRO, Inc.
PROJECT #NC105252

PHOENIX
Environmental Laboratories, Inc.

Monday, November 01, 2010

Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Project ID: NC 105245
Sample ID#s: AZ70560 - AZ70562

This laboratory is in compliance with the QA/QC procedures outlined in EPA 600/4-79-019, Handbook for Analytical Quality in Water and Waste Water, March 1979, SW846 QA/QC and NELAC requirements of procedures used.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

If you have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext. 200.

Sincerely yours,

Phyllis Shiller
Laboratory Director

NELAC - #NY11301
CT Lab Registration #PH-0618
MA Lab Registration #MA-CT-007
ME Lab Registration #CT-007
NH Lab Registration #213693-A,B
NJ Lab Registration #CT-003
NY Lab Registration #11301
PA Lab Registration #68-03530
RI Lab Registration #63
VT Lab Registration #VT11301

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax: (860) 645-0823

NY # 11301

Analysis Report

November 17, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	SOLID	Collected by:	WM	10/27/10	0:00
Location Code:	SUNPRO	Received by:	LDF	10/28/10	9:00
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ70560
Phoenix ID: AZ70560

Project ID: NC 105245
Client ID: 245-1

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	100	1	%	10/29/10		LB	E160.3
Soil Extraction for PCB	Completed			10/28/10		BS/F	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1221	ND	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1232	ND	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1242	ND	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1248	*	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1254	*	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1260	ND	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1262	ND	2500	ug/Kg	11/01/10		MH	SW 8082
PCB-1268	ND	2500	ug/Kg	11/01/10		MH	SW 8082
Total PCBs	4400	2500	ug/Kg	11/01/10		MH	SW 8082
QA/QC Surrogates							
% DCBP	122		%	11/01/10		MH	SW 8082
% TCMX	94		%	11/01/10		MH	SW 8082

Project ID: NC 105245
Client ID: 245-1

Phoenix I.D.: AZ70560

Parameter	Result	RL	Units	Date	Time	By	Reference

Comments:

* For PCBs, as per section 11.9.3, when multiple Aroclor's of PCBs are present and the aroclor is no longer recognizable, quantitation may be performed by using the total area of the PCB pattern to that of the aroclor it mostly resembles. The PCB pattern did not resemble any of the standards, but most closely resembles a mixture of the Aroclors 1248 and 1254.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 17, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax: (860) 645-0823

NY # 11301

Analysis Report

November 17, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	SOLID	Collected by:	WM	10/27/10	0:00
Location Code:	SUNPRO	Received by:	LDF	10/28/10	9:00
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAz70560
Phoenix ID: AZ70561

Project ID: NC 105245
Client ID: 245-2

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	100	1	%	10/29/10		LB	E160.3
Soil Extraction for PCB	Completed			10/28/10		BB/F	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1221	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1232	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1242	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1248	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1254	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1260	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1262	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
PCB-1268	ND	1000	ug/Kg	11/01/10		M/P	SW 8082
QA/QC Surrogates							
% DCBP	121		%	11/01/10		M/P	SW 8082
% TCMX	94		%	11/01/10		M/P	SW 8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 17, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

NY # 11301

Analysis Report

November 17, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	SOLID	Collected by:	WM	10/27/10	0:00
Location Code:	SUNPRO	Received by:	LDF	10/28/10	9:00
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ70560
Phoenix ID: AZ70562

Project ID: NC 105245
Client ID: 245-3

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	100	1	%	10/29/10		LB	E160.3
Soil Extraction for PCB	Completed			10/28/10		BB/F	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1221	ND	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1232	ND	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1242	ND	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1248	*	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1254	*	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1260	ND	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1262	ND	1700	ug/Kg	11/01/10		MH	SW 8082
PCB-1268	ND	1700	ug/Kg	11/01/10		MH	SW 8082
Total PCBs	14000	1700	ug/Kg	11/01/10		MH	SW 8082
QA/QC Surrogates							
% DCBP	109		%	11/01/10		MH	SW 8082
% TCMX	100		%	11/01/10		MH	SW 8082

Project ID: NC 105245
Client ID: 245-3

Phoenix I.D.: AZ70562

Parameter	Result	RL	Units	Date	Time	By	Reference

Comments:

* For PCBs, as per section 11.9.3, when multiple Aroclor's of PCBs are present and the aroclor is no longer recognizable, quantitation may be performed by using the total area of the PCB pattern to that of the aroclor it mostly resembles. The PCB pattern did not resemble any of the standards, but most closely resembles a mixture of the Aroclors 1248 and 1254.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 17, 2010

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Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

nelac NY # 11301

QA/QC Report

November 17, 2010

QA/QC Data

SDG I.D.: GAZ70560

Parameter	Blank	LCS %	LCSD %	LCS RPD	MS Rec %	MS Dup Rec %	RPD
QA/QC Batch 164422, QC Sample No: AZ70290 (AZ70560, AZ70561, AZ70562)							
Polychlorinated Biphenyls							
PCB-1016	ND	89	87	2.3	71	87	20.3
PCB-1221	ND						
PCB-1232	ND						
PCB-1242	ND						
PCB-1248	ND						
PCB-1254	ND						
PCB-1260	ND	87	74	16.1	76	84	10.0
PCB-1262	ND						
PCB-1268	ND						
% DCBP (Surrogate Rec)	95	80	75	6.5	104	124	17.5
% TCMX (Surrogate Rec)	86	72	67	7.2	69	84	19.6

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

RPD - Relative Percent Difference
LCS - Laboratory Control Sample
LCSD - Laboratory Control Sample Duplicate
MS - Matrix Spike
MS Dup - Matrix Spike Duplicate
NC - No Criteria

Phyllis Shiller, Laboratory Director
November 17, 2010

SUNPRO CHAIN OF CUSTODY

№ 3988

Project No. NE105245

Sampler: (Signature) [signature] Printed Name: Wolfgang Medek

Project Location: City scrap - Shredder

REMARKS: 21° N/C

Sample No.	Date	Time	Location or Equipment No.	Sample Type	PCB by Aroclor	BTEX	Fluid Quality	DGA	FURAN	Solvent Exchange				PRIORITY	REMARKS
245-1	10/22	PM	East Motor ceiling	solid	✓						70560				72 hr TAT
245-2	|	|	West Motor ceiling	|	✓						70561				↓
245-3	10/22	PM	south Wall and floor	solid	✓						70562				
											70563 (LOE)				

Total Number of Sample Containers Included:

_______ as an authorized agent of _______ (the Company) certifies that the equipment/area sampled by SUNPRO, INC. has been left in the same condition as prior to sampling. The Company relinquishes the above listed sample(s) to the care and custody of SUNPRO, INC., to be transported and delivered to the below listed analytical laboratory. The Company agrees to hold SUNPRO, INC. harmless for any liability resulting from subsequent leaks, mechanical and/or electrical failure of any equipment/area. The Company also accepts all liability for any spills which are the result of the Company's actions or equipment failure such as but not limited to a faulty sampling valve.

Authorized Agent: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
[signature]	10/[illegible]	2[illegible]	[signature]	Fed Ex	10/28	9:00	[signature]
Relinquished by: (Signature) [signature]	10/27/0	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)

SUNPRO
7640 Whipple Ave., N.W.
North Canton, OH 44720
FAX RESULTS TO: 330-966-1954

24 Hr. Hotline
(800)488-0910

Laboratory: Phoenix Env. Labs Phone:
Address: 587 E Middle Tpk
City, State, Zip: Manchester, CT.

PHOENIX
Environmental Laboratories, Inc.

Friday, November 12, 2010

Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Project ID: NC 105252
Sample ID#s: AZ75769 - AZ75782

This laboratory is in compliance with the QA/QC procedures outlined in EPA 600/4-79-019, Handbook for Analytical Quality in Water and Waste Water, March 1979, SW846 QA/QC and NELAC requirements of procedures used.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

If you have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext. 200.

Sincerely yours,

Phyllis Shiller
Laboratory Director

NELAC - #NY11301
CT Lab Registration #PH-0618
MA Lab Registration #MA-CT-007
ME Lab Registration #CT-007
NH Lab Registration #213693-A,B
NJ Lab Registration #CT-003
NY Lab Registration #11301
PA Lab Registration #68-03530
RI Lab Registration #63
VT Lab Registration #VT11301

587 East Middle Turnpike, P.O. Box 370, Manchester, CT 06040
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PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75769

Project ID: NC 105252
Client ID: 252-W1

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogate							
% DCBP	116		%	11/11/10		MH	SW8082
% TCMX	72		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

nelac
NY # 11301

Analysis Report
November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75770

Project ID: NC 105252
Client ID: 252-W2

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	115		%	11/11/10		MH	SW8082
% TCMX	76		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

nelac NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75771

Project ID: NC 105252
Client ID: 252-W3

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	122		%	11/11/10		MH	SW8082
% TCMX	76		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75772

Project ID: NC 105252
Client ID: 252-W4

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
Q.A/QC Surrogates							
% DCBP	92		%	11/11/10		MH	SW8082
% TCMX	83		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax: (860) 645-0823

NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75773

Project ID: NC 105252
Client ID: 252-W5

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	102		%	11/11/10		MH	SW8082
% TCMX	68		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax (860) 645-0823

nelac NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75774

Project ID: NC 105252
Client ID: 252-W6

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	108		%	11/11/10		MH	SW8082
% TCMX	71		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

nelac NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7540 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75775

Project ID: NC 105252
Client ID: 252-W7

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	97		%	11/11/10		MH	SW8082
% TCMX	87		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

Ver 1

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

nelac NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75776

Project ID: NC 105252
Client ID: 252-W8

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	85		%	11/11/10		MH	SW8082
% TCMX	58		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected. BDL=Below Detection Level. RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

nelac NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75777

Project ID: NC 105252
Client ID: 252-W9

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	94		%	11/11/10		MH	SW8082
% TCMX	61		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

NELAC NY # 11301

Analysis Report
November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75778

Project ID: NC 105252
Client ID: 252-W10

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	64		%	11/11/10		MH	SW8082
% TCMX	55		%	11/11/10		MH	SW8082

Comments

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax: (860) 645-0823

nelac NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75779

Project ID: NC 105252
Client ID: 252-W11

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	72		%	11/11/10		MH	SW8082
% TCMX	81		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75780

Project ID: NC 105252
Client ID: 252-W12

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	51		%	11/11/10		MH	SW8082
% TCMX	44		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax: (860) 645-0823

nelac
NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75781

Project ID: NC 105252
Client ID: 252-W13

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BBB	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	98		%	11/11/10		MH	SW8082
% TCMX	65		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:	KK	11/09/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/10/10	8:30
Rush Request:	RUSH##	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ75769
Phoenix ID: AZ75782

Project ID: NC 105252
Client ID: 252-W14

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/10/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	1.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	1.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	68		%	11/11/10		MH	SW8082
% TCMX	57		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax: (860) 645-0823

NY 4 11301

QA/QC Report

November 15, 2010

QA/QC Data

SDG I.D.: GAZ75769

Parameter	Blank	LCS %	LCSD %	LCS RPD	MS Rec %	MS Dup Rec %	RPD
QA/QC Batch 165456, QC Sample No: AZ75769 (AZ75769, AZ75770, AZ75771, AZ75772, AZ75773, AZ75774, AZ75775, AZ75776, AZ75777, AZ75778, AZ75779, AZ75780, AZ75781, AZ75782)							
Polychlorinated Biphenyl							
PCB-1016	ND	86	102	7.1			
PCB-1221	ND						
PCB-1232	ND						
PCB-1242	ND						
PCB-1248	ND						
PCB-1254	ND						
PCB-1260	ND	115	117	1.7			
PCB-1262	ND						
PCB-1268	ND						
% DCBP (Surrogate Rec)	139	143	147	2.8			
% TCMX (Surrogate Rec)	79	89	94	5.5			
Comment:							
A LCS and LCS Duplicate were performed instead of a matrix spike and matrix spike duplicate.							

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

RPD - Relative Percent Difference
LCS - Laboratory Control Sample
LCSD - Laboratory Control Sample Duplicate
MS - Matrix Spike
MS Dup - Matrix Spike Duplicate
NC - No Criteria

Phyllis Shiller, Laboratory Director
November 15, 2010

SUNPRO CHAIN OF CUSTODY

No. 2738

Project No. NC105252 | Sampler: (Signature) | Printed Name: Ken Kozak

Project Location: City Scrap & Salvage Co

Sample No.	Date	Time	Location or Equipment No.	Sample Type	PCB by Aroclor	BTEX	Flash Point	DOA	FURAN	Solvent Extract	PRIORITY	REMARKS
252-W1	11/4/10	PM	G1	WIPE	X					75769		72 HR
252-W2			G34		X					75770		TURN
252-W3			G34		X					75771		
252-W4			G37		X					75772		
252-W5			G14		X					75773		
252-W6			G15		X					75774		
252-W7			G16		X					75775		
252-W8			G20		X					75776		
252-W9			G50		X					75777		
252-W10			G53		X					75778		
252-W11			G56		X					75779		

Total Number of Sample Containers Included:

_____ as an authorized agent of _____ (the Company) certifies that the equipment/area sampled by SUNPRO, INC. has been left in the same condition as prior to sampling. The Company relinquishes the above listed sample(s) to the care and custody of SUNPRO, INC., to be transported and delivered to the below listed analytical laboratory. The Company agrees to hold SUNPRO, INC. harmless for any liability resulting from subsequent leaks, mechanical and/or electrical failure of any equipment/area. The Company also accepts all liability for any spills which are the result of the Company's actions or equipment failure such as but not limited to a faulty sampling valve.

Authorized Agent: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
	11/4/10			Fed Ex	11/5/10	8:30	Rita Fiser
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)

SUNPRO
7640 Whipple Ave., N.W.
North Canton, OH 44720
FAX RESULTS TO: 330-966-1964

24 Hr. Hotline
(800)488-0910

Laboratory: Phoenix Env. Labs | Phone:
Address: 587 E. Middle Tpk
City, State, Zip: Manchester, CT

White Canary

SUNPRO CHAIN OF CUSTODY

MP 2739

Project No.	Sampler: (Signature)	Printed Name	ANALYSIS
NC05252		Ken Rozak	

Project Location: City Scrap & Salvage Co

Sample No.	Date	Time	Location or Equipment No.	Sample Type	PCB by Arochlor	BTEX	Field Quality	DGA	FURAN	Solvent Extract		PRIORITY	REMARKS
252-W12	11/9/10	PM	G59	WIPE	X						75780		72-Hour Turn
252-W13	"	"	G74	"	X						76081		↓
252-W14	"	"	G86	"	X						75082		
~~252-W15~~													

Total Number of Sample Containers Included

_____ as an authorized agent of _____ (the Company) certifies that the equipment/area sampled by SUNPRO, INC. has been left in the same condition as prior to sampling. The Company relinquishes the above listed sample(s) to the care and custody of SUNPRO, INC., to be transported and delivered to the below listed analytical laboratory. The Company agrees to hold SUNPRO, INC. harmless for any liability resulting from subsequent leaks, mechanical and/or electrical failure of any equipment/area. The Company also accepts all liability for any spills which are the result of the Company's actions or equipment failure such as but not limited to a faulty sampling valve.

Authorized Agent: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
	11/9/10	PM		Fed Ex	11/10	5:30	
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)

SUNPRO
7640 Whipple Ave., N.W.
North Canton, OH 44720
FAX RESULTS TO: 330-966-1954

24 Hr. Hotline
(800)488-0910

Laboratory: Phenix Eng. Labs Phone: _____
Address: 587 E Middle Tpk
City, State, Zip: Manchester, CT

PHOENIX
Environmental Laboratories, Inc.

Friday, November 12, 2010

Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Project ID: NC 105252
Sample ID#s: AZ76205

This laboratory is in compliance with the QA/QC procedures outlined in EPA 600/4-79-019, Handbook for Analytical Quality in Water and Waste Water, March 1979, SW846 QA/QC and NELAC requirements of procedures used.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

If you have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext. 200.

Sincerely yours,

Phyllis Shiller

Laboratory Director

NELAC - #NY11301
CT Lab Registration #PH-0618
MA Lab Registration #MA-CT-007
ME Lab Registration #CT-007
NH Lab Registration #213693-A,B
NJ Lab Registration #CT-003
NY Lab Registration #11301
PA Lab Registration #68-03530
RI Lab Registration #63
VT Lab Registration #VT11301

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel (860) 645-1102 Fax (860) 645-0823

NY # 11301

Analysis Report

November 12, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	WIPE	Collected by:		11/10/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/11/10	8:50
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ76205
Phoenix ID: AZ76205

Project ID: NC 105252
Client ID: 252-W14

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB Wipe Extraction	Completed			11/18/10		BB/B	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1221	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1232	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1242	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1248	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1254	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1260	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1262	ND	2.0	ug	11/11/10		MH	SW8082
PCB-1268	ND	2.0	ug	11/11/10		MH	SW8082
QA/QC Surrogates							
% DCBP	74		%	11/11/10		MH	SW8082
% TCMX	49		%	11/11/10		MH	SW8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 15, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

NY # 11301

QA/QC Report

November 15, 2010

QA/QC Data

SDG I.D.: GAZ76205

Parameter	Blank	LCS %	LCSD %	LCS RPD	MS Rec %	MS Dup Rec %	RPD
QA/QC Batch 165456, QC Sample No: AZ75769 (AZ76205)							
Polychlorinated Biphenyl							
PCB-1016	ND	95	102	7.1			
PCB-1221	ND						
PCB-1232	ND						
PCB-1242	ND						
PCB-1248	ND						
PCB-1254	ND						
PCB-1260	ND	115	117	1.7			
PCB-1262	ND						
PCB-1268	ND						
% DCBP (Surrogate Rec)	130	143	147	2.8			
% TCMX (Surrogate Rec)	79	89	94	5.5			

Comment:

A LCS and LCS Duplicate were performed instead of a matrix spike and matrix spike duplicate.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

RPD - Relative Percent Difference
LCS - Laboratory Control Sample
LCSD - Laboratory Control Sample Duplicate
MS - Matrix Spike
MS Dup - Matrix Spike Duplicate
NC - No Criteria

Phyllis Shiller, Laboratory Director
November 15, 2010

SUNPRO CHAIN OF CUSTODY

№ 3159

Project No. NC105252

Sampler: (Signature) | Printed Name

Project Location: City Scrap & Salvage Co.

Sample No.	Date	Time	Location or Equipment No.	Sample Type	PCB by Aroclor	BTEX	Fluid Quality	DGA	FURAN	Solvent Extraction		PRIORITY	REMARKS
252-W1	11/10/10		G-2-1	Wipe	X						76805		48 hr TAT

Total Number of Sample Containers included

______ as an authorized agent of ______ (the Company) certifies that the equipment/area sampled by SUNPRO, INC. has been left in the same condition as prior to sampling. The Company relinquishes the above listed sample(s) to the care and custody of SUNPRO, INC., to be transported and delivered to the below listed analytical laboratory. The Company agrees to hold SUNPRO, INC. harmless for any liability resulting from subsequent leaks, mechanical and/or electrical failure of any equipment/area. The Company also accepts all liability for any spills which are the result of the Company's actions or equipment failure such as but not limited to a faulty sampling valve.

Authorized Agent: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
[signature]	11/10	11:00	[signature]	[signature]	11/11	860	[signature]
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)

SUNPRO
7640 Whipple Ave., N.W.
North Canton, OH 44720
FAX RESULTS TO: 330-966-1954

24 Hr. Hotline
(800)488-0910

Laboratory: Phoenix Env. Labs
Phone:
Address: 587 E Middle Tpk
City, State, Zip: Manchester, Ct

PHOENIX
Environmental Laboratories, Inc.

Wednesday, November 17, 2010

Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Project ID: NC 105252
Sample ID#s: AZ77355 - AZ77356

This laboratory is in compliance with the QA/QC procedures outlined in EPA 600/4-79-019, Handbook for Analytical Quality in Water and Waste Water, March 1979, SW846 QA/QC and NELAC requirements of procedures used.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

If you have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext. 200.

Sincerely yours,

Phyllis Shiller
Laboratory Director

NELAC - #NY11301
CT Lab Registration #PH-0618
MA Lab Registration #MA-CT-007
ME Lab Registration #CT-007
NH Lab Registration #213693-A,B
NJ Lab Registration #CT-003
NY Lab Registration #11301
PA Lab Registration #68-03530
RI Lab Registration #63
VT Lab Registration #VT11301

587 East Middle Turnpike, P.O. Box 370, Manchester, CT 06040
Telephone (860) 645-1102 Fax (860) 645-0823

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax (860) 645-0823

NY # 11301

Analysis Report

November 17, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	SOLID	Collected by:		11/15/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/16/10	9:00
Rush Request:	RUSH24	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ77355
Phoenix ID: AZ77355

Project ID: NC 105252
Client ID: 252-S1

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	100	1	%	11/17/10		JL	E160.3
Soil Extraction for PCB	Completed			11/16/10		BBF	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1221	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1232	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1242	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1248	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1254	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1260	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1262	ND	900	ug/Kg	11/17/10		MH	SW 8082
PCB-1268	ND	900	ug/Kg	11/17/10		MH	SW 8082
QA/QC Surrogates							
% DCBP	102		%	11/17/10		MH	SW 8082
% TCMX	89		%	11/17/10		MH	SW 8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 18, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel: (860) 645-1102 Fax: (860) 645-0823

NY # 11301

Analysis Report

November 17, 2010

FOR: Attn: Mr. Ken Kozak
Sunpro
7640 Whipple Ave, NW
North Canton, OH 44720

Sample Information		Custody Information		Date	Time
Matrix:	SOLID	Collected by:		11/15/10	0:00
Location Code:	SUNPRO	Received by:	LDF	11/16/10	9:00
Rush Request:	RUSH24	Analyzed by:	see "By" below		
P.O.#:					

Laboratory Data

SDG ID: GAZ77355
Phoenix ID: AZ77356

Project ID: NC 105252
Client ID: 252-S2

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	100	1	%	11/17/10		JL	E160.3
Soil Extraction for PCB	Completed			11/16/10		BB/F	SW3545
Polychlorinated Biphenyls							
PCB-1016	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1221	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1232	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1242	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1248	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1254	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1260	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1262	ND	1000	ug/Kg	11/17/10		MH	SW 8082
PCB-1268	ND	1000	ug/Kg	11/17/10		MH	SW 8082
QA/QC Surrogates							
% DCBP	83		%	11/17/10		MH	SW 8082
% TCMX	71		%	11/17/10		MH	SW 8082

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Level RL=Reporting Level

Phyllis Shiller, Laboratory Director
November 18, 2010

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045
Tel. (860) 645-1102 Fax (860) 645-0823

nelac
NY # 11301

QA/QC Report

November 18, 2010

QA/QC Data

SDG I.D.: GAZ77355

Parameter	Blank	LCS %	LCSD %	LCS RPD	MS Rec %	MS Dup Rec %	RPD
QA/QC Batch 165733, QC Sample No: AZ76945 (AZ77355, AZ77356)							
Polychlorinated Biphenyls							
PCB-1016	ND	109	109	0.0	105	107	1.9
PCB-1221	ND						
PCB-1232	ND						
PCB-1242	ND						
PCB-1248	ND						
PCB-1254	ND						
PCB-1260	ND	101	116	13.8	108	103	4.7
PCB-1262	ND						
PCB-1268	ND						
% DCBP (Surrogate Rec)	115	113	106	6.4	109	110	0.9
% TCMX (Surrogate Rec)	85	96	87	9.8	88	91	3.4

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

RPD - Relative Percent Difference
LCS - Laboratory Control Sample
LCSD - Laboratory Control Sample Duplicate
MS - Matrix Spike
MS Dup - Matrix Spike Duplicate
NC - No Criteria

Phyllis Shiller, Laboratory Director
November 18, 2010

SUNPRO CHAIN OF CUSTODY

№ 3160

Project No. NC105252
Sampler: (Signature) Printed Name

Project, Location: City Scrap & Salvage Co.

Sample No.	Date	Time	Location or Equipment No.	Sample Type	PCB by Aroclor	BTEX	Fluid Quality	DGA	FURAN	Solvent Exchange				PRIORITY	REMARKS
															19" N/C
252-S1	11/5/10		Exhaust insulation	Solid	X					77355					24hr TAT
252-S2	↓		Garage door insulation	Solid	X					77356					

Total Number of Sample Containers Included:

______ as an authorized agent of ______ (the Company) certifies that the equipment/area sampled by SUNPRO, INC. has been left in the same condition as prior to sampling. The Company relinquishes the above listed sample(s) to the care and custody of SUNPRO, INC., to be transported and delivered to the below listed analytical laboratory. The Company agrees to hold SUNPRO, INC. harmless for any liability resulting from subsequent leaks, mechanical and/or electrical failure of any equipment/area. The Company also accepts all liability for any spills which are the result of the Company's actions or equipment failure such as but not limited to a faulty sampling valve.

Authorized Agent: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
[signature]	11/5/10		[signature]	Fed Ex	11/16	9:00	[signature]
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Relinquished by: (Signature)	Date	Time	Received by: (Signature)

SUNPRO
7640 Whipple Ave., N.W.
North Canton, OH 44720
FAX RESULTS TO: 330-966-1954

24 Hr. Hotline
(800)488-0910

Laboratory: Phoenix Env. Lab Phone
Address: 587 E Middle Tpk
City, State, Zip: Manchester, CT

APPENDIX 4

SUNPRO SITE SPECIFIC HEALTH & SAFETY PLAN

PCB REMEDIATION SERVICES
CITY SCRAP & SALVAGE COMPANY
SHREDDER ENGINE HOUSE

SUNPRO, Inc.
PROJECT #NC105252

PCB

SUNPRO, INCORPORATED

HEALTH AND SAFETY PLAN

FOR

CITY SCAP AND SALVAGE CO.
611 W WILBETH ROAD
AKRON,OHIO

PROJECT NUMBER: NC105252

PREPARED BY N Garig

DATE: 11-5-10

APPROVED BY:_____

DATE:_____

SITE/PROJECT DESCRIPTION

SITE DESCRIPTION: ~~ACTIVE SUBSTATION~~

ELECTRICAL SITE DESCRIPTION: *IN SERVICE YES ___ NO___X___*

BACKGROUND

SUNPRO visited the City Scrap Shredder Engine House Building on October 20, 2010 to review PCB remediation options for the site. The two story building measuring approximately 30' x 30', is significantly impacted with residual oil and grease. The upper level floor contains two Waukesha engines mounted on the concrete floor. The floor exhibits a heavy layer of grease and oil with several conduits leading to the basement. We understand that limited wipe sampling identified PCB levels of 18 and 28 ug/100 cm^2 from the floor area.

The ground level floor is divided into two rooms, each measuring approximately 15' x 30'. While the ground level floor has been largely degreased, oil and water are present across much of the floor. Sumps, estimated to be the size of 5-gallon buckets are located near the southeast corners of each room, with both sumps being full of oil/water. We understand that concrete core sampling of the ground level floor identified PCB levels to be below 1.0 ppm.

Additionally, various areas of the accessible concrete basement walls exhibit oil staining with residual oil visible. The oil is believed to be originating from the operations on the upper level.

TASKS
SCOPE OF WORK

Based on pursuing the 761.30(p) cleanup option, SUNPRO to provide labor, supervision, equipment and materials to perform the following services for City Scrap & Salvage:

1.0 Preparation:

- 1.1 Provide a site-specific health and safety plan (HASP) for the project, specifically for SUNPRO employees and subcontractors, in accordance with OSHA requirements.
- 1.2 Work with Client to arrange a mutually convenient time schedule for the project.
- 1.3 Review HASP and plan of action with participants and conduct a daily safety meeting on topics pertinent to each work area.
- 1.4 Mobilize equipment and supplies.
- 1.5 City Scrap to move drums and other items to make floor areas readily

accessible.

1.6 Open conduits to be plugged/sealed with foam and/or plugs.

2.0 PCB Remediation:

2.1 SUNPRO will perform initial surface cleaning to remove bulk grease/dirt layers from the upper floor. Waste will be containerized for disposal as PCB.

2.2 Following bulk cleaning, the upper floor will be will be double scrub washed and double layer encapsulated in accordance with 761.30(p).

2.3 The lower level ceiling will be wiped to prevent visible oil from impacting the floor. The accessible wall areas will also be scrub washed and cleaned to remove oil residue. The floor area will then be double scrub washed with the sumps emptied of fluids.

2.4 Following the scrub wash, the accessible wall and floor areas will be double layer encapsulated in accordance with 761.30(p).

2.5 All remediation wastes will be containerized and labeled as PCB.

2.6 PCB labels will be provided to City Scrap for labeling of the floor surface following the drying of the floor coating.

2.7 As authorized, SUNPRO can provide for PCB core sampling of the floor and/or wall areas. It is estimated that each floor level would require 25 samples, while the 1st floor wall surfaces would require 50-60 cores.

3.0 Waste Management:

3.1 All waste containers to be properly labeled with dates, unique serial numbers, and generator specific information.

3.2 The generator of the waste to be City Scrap & Salvage Co. with EPA ID #_____.

3.3 SUNPRO offers this proposal based on the most cost-effective means of transportation and disposal in conformity with applicable DOT and EPA regulations. It is the responsibility of the generator to select and approve the actual disposal site.

PROPOSED DATE(S) OF FIELD ACTIVITY: *11-8-10*

PERSONNEL REQUIREMENTS:

Name	**Responsibility**
Wolf Medek	Project Manager
Kevin Riddell	Environmental Technician
Jordan Wilson	Environmental Technician

HAZARD EVALUATION

MATERIALS OF CONCERN: *Polychlorinated Biphenyl*
Impacted spray insulation and floor surfaces <50PPM

PHYSICAL STATE: *solids*

HEALTH HAZARD INFORMATION: _____

CHEMICAL/PHYSICAL PROPERTIES:

	OSHA PEL	*ACGIH-TWA*	*STEL*
PCB - 42% CL	*1.0mg/m^3*	*1.0mg/m^3*	*1.0mg/m^3*
PCB - 54% CL	*0.5 mg/m^3*	*0.5 mg/m^3*	*0.5 mg/m^3*

OPERATIONAL HAZARDS: *working at heights, confined working conditions*

TOPOGRAPHICAL HAZARDS: SLIPS TRIPS FALLS, WORKING AT HIEGHTS OVER 6-FEET

PROTECTIVE CLOTHING REQUIREMENT:

__x__ WORK CLOTHES/COVERALLS

__x__ WORK SHOES - STEEL TOES (OR PLASTIC)

__X__ HARD HAT (INSULATED)

_____ FACE SHIELD (IF APPLICABLE)

__x__ SAFETY GLASSES/GOGGLES/SIDE SHIELDS

__x__ WATCHES/RINGS/JEWELRY - METALLIC - REMOVE

_____ HOT GLOVES - AS PREVIOUSLY DESCRIBED

HEARING PROTECTION, AS REQUIRED

EYE PROTECTION: *Wear eye protection and have eye wash baths available where there is* ***significant potential*** *for eye contact.*

SKIN PROTECTION: *Wear appropriate protective clothing and chemical resistant gloves to prevent skin contact. Tyvek may be worn for protection from soils and dusts. Chemical resistant clothing such as poly Tyvek should be worn when working with liquids when splashing is likely. Wash immediately if skin is contacted. Wash hands and face thoroughly before drinking or smoking.*

RESPIRATORY PROTECTION: *Avoid breathing vapor, mist, or dust. Use approved respirator when airborne exposure limits are exceeded. Use engineering controls such exhaust ventilation to reduce airborne exposure limits.*

TRAINING REQUIREMENTS: OSHA 40 Hour Training. *Supervisor must have additional 8 hours of OSHA Supervisory training.*

AIR MONITORING REQUIREMENTS

1) INSTRUMENT/ MONITORING PROCEDURES *Not applicable*

DECONTAMINATION PROCEDURES

EQUIPMENT/SOLVENTS/SOLUTIONS: *SUNPRO Citrus Cleaner CC-1, Isopropanol*

DECONTAMINATION PROCEDURE(S):

1) ITEM(S): Expendables such as PPE, rags, and absorbents
   PROCEDURE: Place into a DOT-approved container and label as PCB
2) ITEM(S): Non-expendable tools and equipment
   PROCEDURE: Scrub wash with SUNPRO cleaner, rinse, and wipe dry

DISPOSAL CONSIDERATIONS: *The disposal of PCB items or equipment (those containing 50 ppm or greater PCBs) and PCB wastes is strictly regulated by 40 CFR Part 761. For example, all wastes and residues containing PCBs (rags, absorbents, and disposable PPE) should be collected and placed into DOT-approved containers, marked and disposed of in a manner prescribed in EPA regulations (40 CFR Part 761) and applicable state and local regulations.*

TRANSPORTATION INFORMATION: The data provided in this section is for information only. Please apply the appropriate regulations to properly classify a shipment for transportation.

DOT Classification: **PCB solid debris < 50 PPM PCB**
DOT Label: Class 9
NOTE: The above-specified decontamination procedures pertain to the decontamination of personal protective equipment only. Procedures for the decontamination of sampling tools and other related equipment should be specified in the subject work plan and/or QA plan.

EMERGENCY REFERENCE

AMBULANCE: **911**

POLICE: **911**

FIRE: **911**

HOSPITAL: Akron General Medical Center - more info »
400 Wabash Avenue, Akron, OH (330) 344-6000

DIRECTIONS TO HOSPITAL: (SEE ATTACHED Map)

POISON CONTROL CENTER: 911
NATIONAL RESPONSE CENTER: 1-800-424-8802

SUNPRO REPRESENTATIVES:

N Gang
SUNPRO, Inc., N. Canton, OH (330) 966-0910 Ext 226

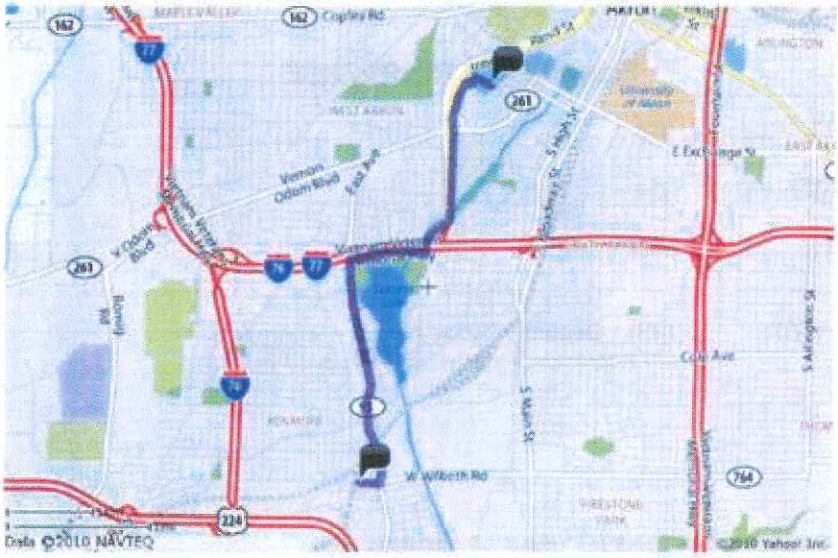
Ken Kozak
SUNPRO, Inc. N. Canton, OH (330) 966-0910 Ext 210
(330) 704-1192 (cellular phone)

CLIENT REPRESENTATIVE: ***Randy Katz 330-753-5051***

NEAREST PHONE: *All SUNPRO employees carry cellular phones*

YAHOO! LOCAL Maps

When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.



A 611 W Wilbeth Road,Akron,Ohio

1. Start at **611 W WILBETH RD, AKRON** going toward **4TH ST SW** - go **0.1** mi
2. Turn **L** on **S MANCHESTER RD BYP(OH-93)** - go **0.7** mi
3. Continue to follow **OH-93** - go **0.9** mi
4. Turn **R** on **SOUTH ST** - go **0.5** mi
5. Turn **L** on **LAKESHORE BLVD**
6. Bear **R** on **DART AVE** - go **1.2** mi
7. Turn **R** on **WABASH AVE**
8. Turn **L** on **WABASH AVE**
9. Turn **R** on **WABASH AVE** - go **0.1** mi
10. Arrive at **400 WABASH AVE, AKRON**, on the **L**

B 400 Wabash Avenue, Akron, OH

Total Distance: 3.66 mi, Total Travel Time: 10 mins

SITE SAFETY PLAN ACCEPTANCE FORM

I have read and understand the information set forth in the preceding Health and Safety Plan and proposed Plan of Action, and agree to comply with the provisions of these plans while on site. I understand that exceptions to these plans are only allowed at the express and documented directive of the Site Health and Safety Officer or the Project Manager, and I agree to notify either one of them immediately should I become aware of a safety or compliance risk not sufficiently addressed in these plans.

Although these plans only address SUNPRO employees and subcontractors, other parties may have been requested to attend this meeting to provide SUNPRO with any information and knowledge about the site that they might be able to share. By signing this, they also agree to the above statements, and agree not to hold SUNPRO responsible for their safety.

Name	Signature	Date	
Wolfgang Medek	W M Medek	11-8-10	
Jordan Wilson	Jordan Wilson	11-8-10	- 11-19-10
Kevin Riddell	Kevin Riddell	11-8-10	- 11-19-10
Glenn King	Glenn E King	11-9-10	
DAN VARNER	Dan Varner	11-9-10	- 11-19-10
Sylvester Robinson	Sylvester Robinson	11-9-10	
Ollie Fowler	Ollie Fowler	11-19-10	
KEN KOZAK		11-9-10	

NOTE: *The above-specified decontamination procedures pertain to the decontamination of personal protective equipment only. Procedures for the decontamination of sampling tools and other related equipment should be specified in the subject work plan and/or QA plan.*

APPENDIX 5

WASTE DISPOSAL DATA

PCB REMEDIATION SERVICES
CITY SCRAP & SALVAGE COMPANY
SHREDDER ENGINE HOUSE

SUNPRO, Inc.
PROJECT # NC105252

Waste Management Summary

A total of six cubic yard boxes and one drum of PCB contaminated solids and debris were generated during this project along with eight drums of PCB contaminated water/rinseate. The PCB solids will be transported under manifest to the EQ – Wayne Disposal facility in Belleville, Michigan with a scheduled delivery date of November 23, 2010. The eight drums of PCB contaminated liquids will be transported under to the Clean Harbors - Cleveland facility for subsequent transport and disposal at the Clean Harbors - Spring Grove Resource Recovery facility in Cincinnati, Ohio. The planned delivery date is November 24, 2010.

Manifest Number	Material Description	Total Quantity	Container Type	Disposal Facility	Scheduled Disposal Date
001346375FLE	Polychlorinated biphenyls solids	6	Cubic Yard Box	Wayne Disposal, Inc.	11/23/2010
001346375FLE	Polychlorinated biphenyls solids	1	55-Gal Drum	Wayne Disposal, Inc.	11/23/2010
001346401FLE	Polychlorinated biphenyls liquid	8	Drums	Spring Grove Resource Recovery	11/24/2010

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHR000162073
2. Page 1 of: 2
3. Emergency Response Phone: 800-488-0910-0
4. Manifest Tracking Number: 001346375 FLE

5. Generator's Name and Mailing Address
CITY SCAP AND SALVAGE CO
811 W WILBETH ROAD
AKRON, OH 44314 USA
Generator's Phone: 330-753-5051

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: SUNPRO INC
U.S. EPA ID Number: OHD000333336

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
EQ WAYNE DISPOSAL, INC SITE 2
49350 NORTH I-94 SERVICE DRIVE
BELLEVILLE, MI 48111 USA
U.S. EPA ID Number: MID048090633
Facility's Phone: 734-699-8297

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. POLYCHLORINATED BIPHENYLS,SOLID,9, UN3432,PG III	06	CF	6600	K	
	2. Polychlorinated Biphenyls, solid, 9, UN3432, PG III	01	DM	34	K	
	3.					
	4.					

14. Special Handling Instructions and Additional Information
9A-1 SOLID DEBRIS <50 PPM PCB
APPROVAL #: NC105252

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Randy Katz
Signature: [signature]
Month: 11 Day: 22 Year: 10

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: DAN VARNER
Signature: [signature]
Month: 11 Day: 22 Year: 10

Transporter 2 Printed/Typed Name
Signature
Month: Day: Year:

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month: Day: Year:

DRAFT

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
OHR000162073	2	800-488-0910-0	001346401 FLE

GENERATOR

5. Generator's Name and Mailing Address
CITY SCAP AND SALVAGE CO.
611 W WILBETH ROAD
AKRON, OH 44314 USA
Generator's Phone: 330-753-5051

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: SUNPRO INC — U.S. EPA ID Number: OHD000333336

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
SPRING GROVE RESOURCE RECOVERY, INC.
4879 SPRING GROVE AVE
CINCINNATI, OH 45232 USA
Facility's Phone: 513-681-6242-0
U.S. EPA ID Number: OHD000816829

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. POLYCHLORINATED BIPHENYLS,LIQUID,9, UN2315,PG III	08	DM	1650	K	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
9A-1 PCB IMPACTED WATER FOR CARBON TREATMENT
[illegible]105252

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** [illegible] the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name [illegible] Signature — Month Day Year

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name — Signature — Month Day Year
Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

City Scrap & Salvage Co. Inc. of Akron

P.O. Box 3718 Akron, Ohio 44314 (330) 753-5051 FAX (330) 753-9288

December 1, 2010

Jose G. Cisneros
Chief, Remediation and Reuse Branch
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Margaret M. Guerriero
Director, Land and Chemicals Division
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: 785 Flora Avenue, Akron, Ohio

Dear Mr. Cisneros and Ms. Guerriero:

City Scrap & Salvage Company (the "Company") is the owner of the facility located at 785 Flora Avenue, Akron, Ohio (the "Facility Property"). In accordance with the requirements set forth by the United States Environmental Protection Agency ("USEPA") in its letter dated August 14, 2009, to the Company, a photocopy of which letter is attached hereto for reference, the Company is required to:

> ... notify the EPA within 20 working days of any conveyance of ownership or responsibility of the facility property. Such notice must include the date of the intended conveyance, and the name, address and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice must also include the name of a contact person.

For your reference, I have also attached the Deed Restriction which has been recorded with regard to the Facility Property under Instrument No. 55680552 in the Recorder's Office, County of Summit, State of Ohio.

Accordingly, the Company hereby provides formal notice to the USEPA of its intent to convey ownership of the Facility Property to TSB Metal Recycling, LLC ("TSB"). The contact person and address of TSB is as follows:

TSB Metal Recycling, LLC
1835 Dueber Avenue SW
Canton, Ohio 44706
Telephone No.: (330) 471-3937
Contact Person: Alan Oberster, VP – Environmental Health & Safety

The parties intend to close the contemplated transaction and convey ownership to the Property on **December 30, 2010.**

If you should have any questions concerning this notice, please do not hesitate to contact the undersigned.

Sincerely,

Steven M. Katz, President

Encl.

cc: William L. Caplan, Esq.
Nathan D. Bailey, Esq.
Grace Y. Ho, Esq.

«AK3:1048509_v1»

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

R. Bardo LU-9J

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Sent To: Jeroen Winterink - CRA
Street, Apt. No.; or PO Box No.: 9033 Meridian Way
City, State, ZIP+4: West Chester, OH 45069

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jeroen Winterink
Conestoga-Rovers & Assoc.
9033 Meridian Way
West Chester, OH 45069

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* — B. Date of Delivery

C. Signature
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D. Is delivery address different from item 1? ☐ Yes
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☑ Certified Mail ☐ Express Mail
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4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7001 0320 0006 0192 8269

PS Form 3811, March 2001 — Domestic Return Receipt — 102595-01-M-1424

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
77 W. Jackson Blvd.
Chicago, IL 60604

Land and Chemicals Division

Correspondence for Land and Chemical Division Director's Signature

Subject: Conditional Approval of PCB Risk-Based Disposal for the City Scrap and Salvage Company located in Akron, Ohio.

TO:	Initials	Date
1. *Ken Bardo, Author, RRB, CAS2:*	KB	8/6/09
2. *Angela Jackson, Assistant, CAS2:*	AJ	8/11/09
3. *George Hamper, Chief, CAS2:*	GH	8/11/09
6. ~~, Assistant, RRB~~		
7. *Jose G. Cisneros, Chief, RRB*	JC	8/11/09
8. *Margaret M. Guerriero, Director, LCD*	auforMG	8/14/09

Comments:

Margaret
Ken Bardo has done a review of the planned remedy and agrees that it is appropriate. I recommend that you sign the Approval Letter. Thanks! Joe

BRIEFING PAPER

PCB Risk-Based Cleanup and Disposal
City Scrap and Salvage, Akron, Ohio

Action: PCB cleanup to remove over 1,000 cubic yards of contaminated surface soil and to cover a major portion of the site with a concrete cover.

Schedule: Work would commence within 14 days upon EPA approval of the risk-based cleanup.

Background: The metal salvage and car shredding facility has operated since the 1940s on a 10-acre parcel. The current owners are performing the cleanup to accommodate a sale of the property which would continue to be operated as a scrap and salvage yard. In its review of the risk-based approval application, EPA also confirmed with Ohio EPA that the facility needs a stormwater permit. The site will apply for a stormwater permit and upgrade the on-site stormwater management system.

Potential Issues: There will be off-site cleanup of 150 cubic yards of railroad and street right-of-ways. Access agreements will be necessary.

Remedy Summary:

- Excavate and dispose of 875 cubic yards of on-site soil contaminated with PCBs.
- Excavate and dispose of 150 cubic yards of off-site soil contaminated with PCBs.
- Cover a large area surrounding the shredder building with a minimum 9" of concrete.
- Obtain an Ohio EPA permit and upgrade the stormwater management system.
- The off-site cleanup goal is <1 ppm of PCBs.
- The on-site cleanup goal is <10 ppm PCBs under the concrete cover.
- The on-site cleanup goal is <1 ppm average PCBs for the western and eastern areas not covered with concrete.
- A deed restriction will be placed on the property that identifies the presence of residual PCB contamination, restricts land use to industrial/commercial, and requires the site to be fenced with locked gates.
- A remediation completion report will be submitted to EPA documenting that the PCB remediation has been completed in accordance with the approved application and EPA conditions.

Recommendations: The risk-based approval with EPA conditions is protective of human health and the environment, and will assist in the re-use of industrial property. We recommend that the risk-based approval be signed.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 14 2009

REPLY TO THE ATTENTION OF: L-8J

VIA E-MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED 7001 0320 0006 0192 8269

Mr. Jeroen Winterink
Conestoga-Rovers & Associates
9033 Meridian Way
West Chester, Ohio 45069

RE: Approval with Conditions for Risk-Based Cleanup and Disposal of PCBs
City Scrap and Salvage Company, Akron, Ohio

Dear Mr. Winterink:

The U.S. Environmental Protection Agency approves the application submitted by Conestoga-Rovers & Associates on August 3, 2009, and revised Figures 4a and 4b of the application e-mailed on August 5, 2009, to cleanup and dispose of polychlorinated biphenyls (PCBs) at the City Scrap and Salvage Company (CSSC) facility located at 611 W. Wilbeth Road in Akron, Ohio.

This Approval allows the cleanup and disposal of PCB remediation waste consisting of surface soil and concrete which was characterized as containing PCBs greater than 1 but less than 100 parts per million (ppm). PCB remediation waste found on-site that contains greater than 10 ppm PCBs will be excavated and disposed off-site. PCB remediation waste found on-site that contains less than 10 ppm but greater than 1 ppm PCBs will either be excavated and disposed off-site or disposed on-site under a minimum 9" concrete cover. All PCB remediation waste located off-site at the perimeter of CSSC property containing greater than 1 ppm PCBs will be excavated and disposed off-site.

This Approval is granted in accordance with 40 C.F.R. § 761.61(c) under which the Regional Administrator may approve a method to sample, cleanup, or dispose of PCB remediation waste if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. The authority to grant such approvals in Region 5 has been delegated to the Land and Chemicals Division Director.

EPA grants this Approval based on our finding that the cleanup of PCB remediation waste at and in the vicinity of the CSSC facility and its off-site disposal, in compliance with the terms and enclosed conditions of this letter, does not pose an unreasonable risk of injury to health or the environment. This Approval is effective as of the date of this letter.

CSSC must complete the risk-based cleanup and disposal in accordance with the approved August 3, 2009, application, revised Figures 4a and 4b of the application, and enclosed conditions of approval. If CSSC deviates from the terms and enclosed conditions of this letter without prior written approval of EPA, it may result in the immediate suspension of this Approval, the commencement of proceedings to revoke this Approval, and/or an enforcement action. In addition, this Approval may be suspended or revoked at any time if EPA has reason to believe that the continued cleanup and off-site disposal of PCB remediation waste from the CSSC presents an unreasonable risk to human health or the environment.

This Approval does not relieve CSSC from the responsibility to comply with all applicable provisions of TSCA and the federal PCB regulations or any other applicable, federal, state or local regulations or permits. This Approval does not preclude EPA from initiating an enforcement action, including seeking civil penalties, for violations of TSCA and the federal PCB regulations.

If you have any questions, please contact Ken Bardo of my staff at 312-886-7566.

Sincerely,

for Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

ENCLOSURE

Conditions of Approval
City Scrap and Salvage Company
611 W. Wilbeth Road, Akron, Ohio

A. **Authorized Remedial Action**

City Scrap and Salvage Company (CSSC) is authorized to cleanup and dispose of PCBs at its facility located at 611 W. Wilbeth Road in Akron, Ohio according to the Conditions of Approval described below, and the application for risk-based disposal submitted by Conestoga-Rovers & Associates on August 3, 2009, and revised Figures 4a and 4b of the application submitted on August 5, 2009. In the event that the Conditions of Approval are inconsistent with the procedures described in the application for risk-based disposal, CSSC must abide by the Conditions of Approval.

B. **PCB Remediation**

1. PCB-contaminated soil must be cleaned up to the remediation levels specified in the application for risk-based disposal as summarized and modified below:

a. For the area to be remediated at and in the vicinity of the Shredder Building where a minimum 9" concrete cover will be placed after excavation of PCB-contaminated soil and concrete (see attached Figures 4a and 4b), all post-removal verification samples of soil and concrete from the excavation floors and sidewalls must contain <10 ppm total PCBs.

b. For the area to be partially remediated at and west of the Shredder Building that is not to be covered with a minimum 9" concrete cover (see attached Figure 4a), all post-removal verification samples of soil from the excavation floors and sidewalls in the remediated area must contain <10 ppm total PCBs and the average concentration of total PCBs in surface soil (0 - 2') in the unremediated area (i.e., historical data and post-removal verification samples) is ≤1 ppm total PCBs.

c. For the area to be partially remediated east of the Shredder Building that is not to be covered with a minimum 9" concrete cover (see attached Figures 4b and 4c), all post-removal verification samples of soil from the excavation floors and sidewalls must contain <10 ppm total PCBs and the average concentration of total PCBs in surface soil (0 - 2') in the unremediated area (i.e., historical data and post-removal verification samples) is ≤1 ppm total PCBs.

d. For all off-site areas to be remediated to the north in the vicinity of the CSX railroad tracks and to the south in the vicinity of Flora Avenue, all post-removal

verification samples of soil from the excavation floors and sidewalls must contain ≤1 ppm total PCBs.

2. In Figure 4b of the application for risk-based disposal, the large excavation at the north property boundary must be extended approximately 5-feet to the south so that the excavation of soil includes sample locations B-464 and B-469, prior to conducting post-removal verification sampling.

3. In Figure 4b of the application for risk-based disposal, conduct a minimum 10-foot by 10-foot excavation of PCB-contaminated soil and post-removal verification sampling at sample location B-259.

4. For proposed additional shallow soil sample locations B-805 to B-815 (see attached Figure 4a), samples will be collected at the time of mobilization. The data will be used to determine and adjust the extent of the excavations, as necessary, to ensure that all soil containing ≥10 ppm total PCBs is excavated and disposed off-site.

C. Disposal of Remediation Waste

Materials contaminated with PCBs must be disposed of off-site as a regulated PCB waste or in accordance with the off-site disposal guidelines specified in the application for risk-based disposal which are consistent with and considered as disposal of PCB remediation waste found at 40 C.F.R. § 761.61(a). The historical in-situ sampling that has been conducted or proposed in the application for risk-based disposal may be used to characterize the materials for off-site disposal

All equipment that comes in contact with the PCB remediation waste must be decontaminated following the procedures found at 40 C.F.R. § 761.79(b) or (c).

D. Inspection and Maintenance

The minimum 9" concrete cover to be placed in the vicinity of the Shredder Building must be inspected at least once per year for evidence of cracks, settlement, or other effects that could impair the integrity of the cap and allow for human exposure to underlying soil contaminated with total PCBs >1 ppm. Repairs shall begin within 72 hours of discovery for any breaches which would impair the integrity of the cap and potentially pose a risk to workers.

E. Well Abandonment

When determined by CSSC to be no longer necessary, monitoring wells MW-103, MW-104, MW-205, and MW-206 shall be abandoned and properly sealed in accordance with Ohio Administrative Code 3701-28-07.

F. **Property Use and Restrictions**

Within 45 days of completing the remediation required under this conditional approval, CSSC must record, in accordance with State law, a notation on the deed to the property or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:

1. that the land has been used for PCB remediation waste disposal.
2. of the existence of the concrete cover and the requirement to maintain the concrete cover.
3. of the existence of the fence and the requirement to maintain the fence and keep the gates locked.
4. of the applicable cleanup levels left at the facility, both inside the fence and under the concrete cover.
5. of the land use restrictions for industrial and commercial purposes only.

G. **Remediation Complete Report**

Within 60 days of completing the remediation under this conditional approval, CSSC must submit to EPA:

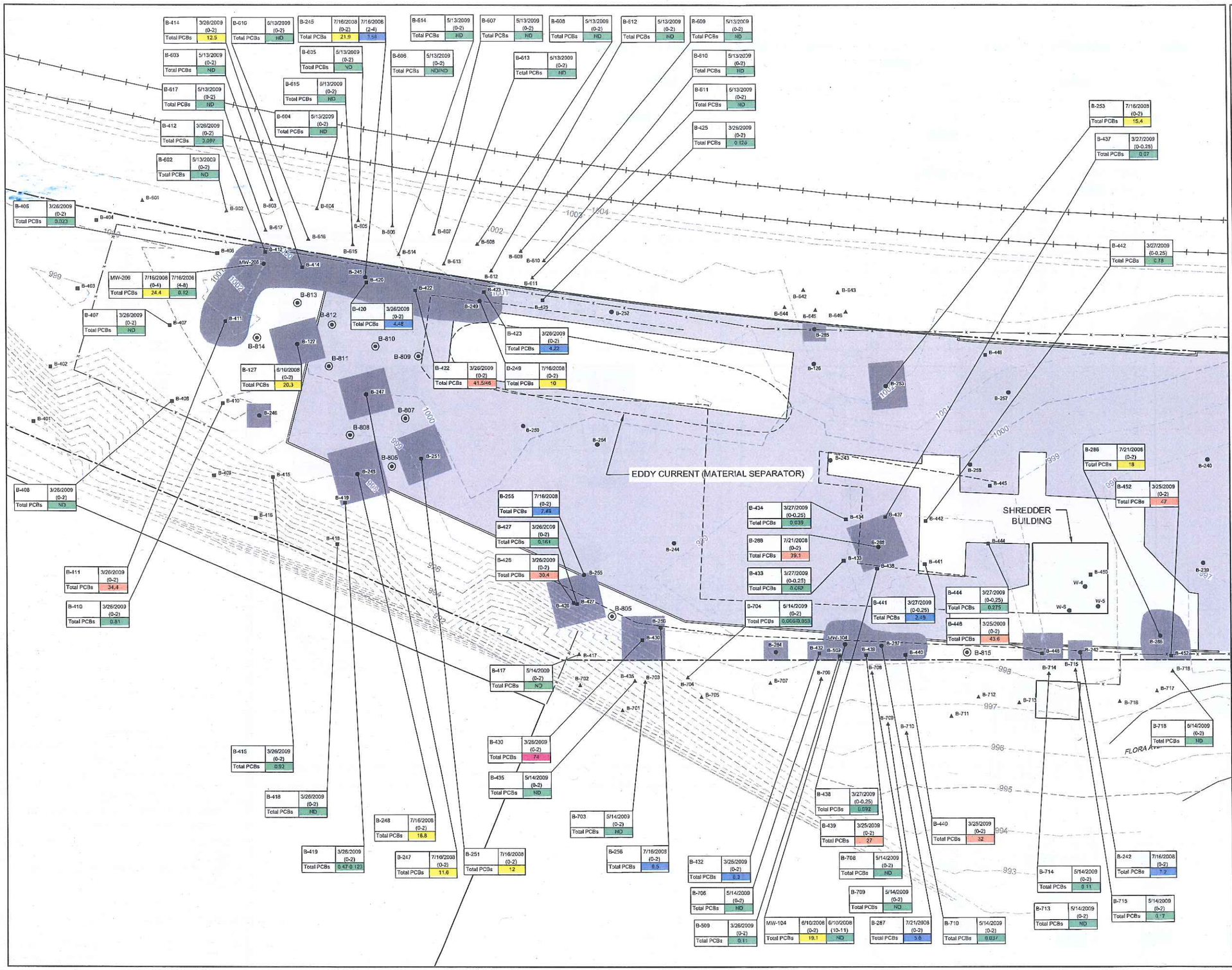
1. an analysis of post-removal verification sample results and demonstration that the areas on the property not covered with concrete have average total PCB concentrations remaining in surface soil <1 ppm, and the area covered with concrete has total PCB concentrations remaining in surface soil <10 ppm.
2. a description of the final specifications of the concrete cover, including a map showing its exact location.
3. a summary of the off-site disposal activities.
4. a discussion of the implementation of any EPA-approved modifications to this conditional approval.
5. a certification, signed by the owner, that it has recorded the notation on the deed for property use and restrictions.

H. **Change of Ownership**

CSSC must notify EPA within 20 working days of any conveyance of ownership or responsibility of the facility property. Such notice must include the date of the intended conveyance, and the name, address, and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice must also include the name of a contact person.

At least 10 working days before such conveyance, CSSC must submit to EPA a notarized affidavit signed by the intended new owner or responsible person that states that such person is

aware of and shall abide by the provisions of the risk-based disposal conditional approval granted to CSSC for this facility.



0 10 20ft

LEGEND
- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2009)
- CRA DATA (MAY 2009)
- PROPOSED ADDITIONAL SHALLOW SOIL SAMPLE LOCATION
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH
- RESULT (mg/kg)
- PARAMETER

TOTAL PCB CONCENTRATIONS
- < 1 ppm PCBs
- ≥ 1 up to < 10 ppm PCBs
- ≥ 10 up to < 25 ppm PCBs
- ≥ 25 up to < 50 ppm PCBs
- ≥ 50 ppm PCBs
- PROPOSED ON-SITE EXCAVATION
- PROPOSED OFF-SITE EXCAVATION
- PROPOSED NEW CONCRETE SLAB AREA

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP AND SALVAGE FACILITY

AKRON, OHIO

PROPOSED SOIL EXCAVATION PLAN SHREDDED METAL AND FLUFF PROCESSING AREA

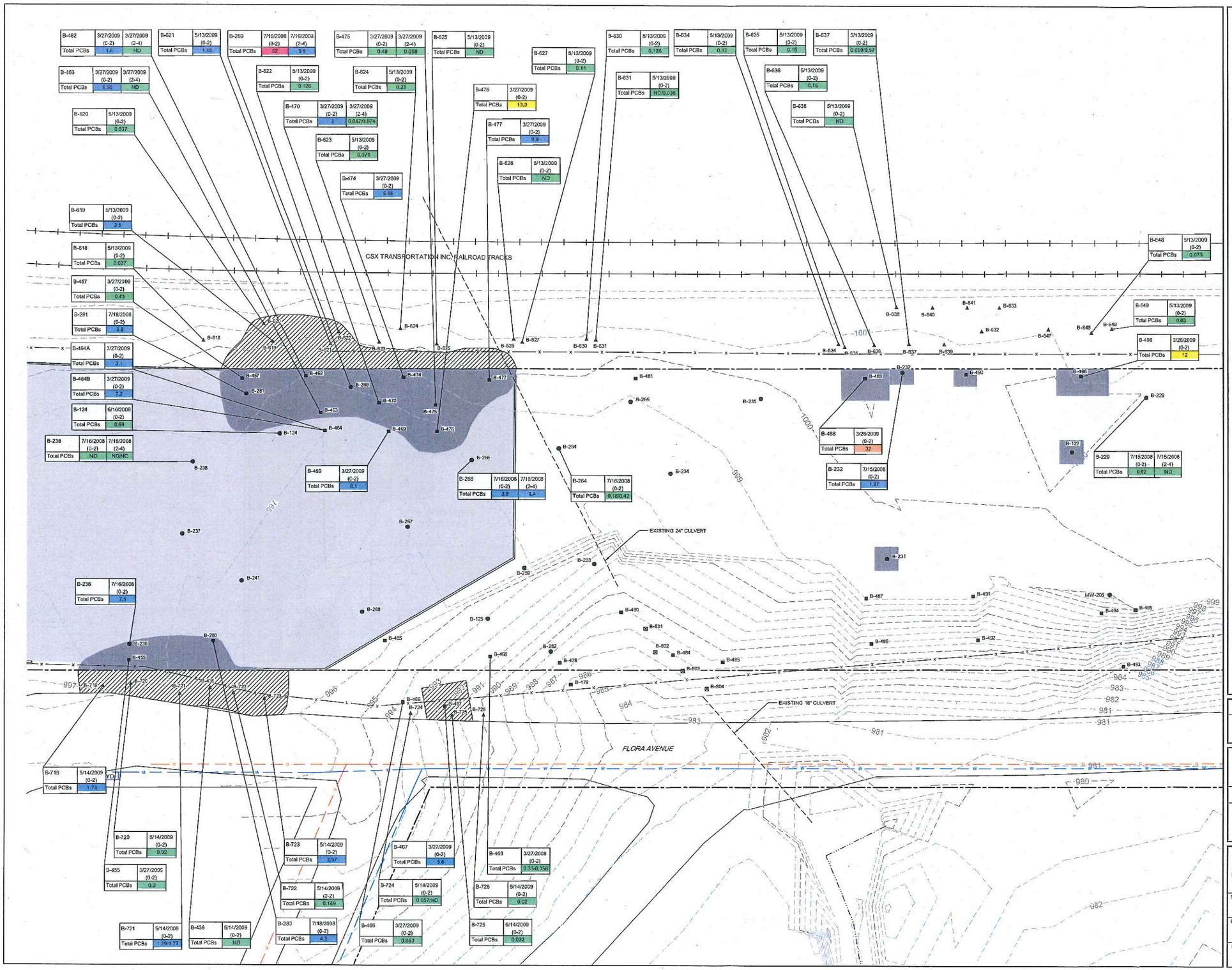
CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TRAVELERS COMPANY, 2527.00 ITY SCRAP REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY PROJECT NO. T-163, APRIL 2009.

Project Manager:	Reviewed By:	Date:
H.C.	S.P.	AUGUST 2009

Scale:	Project No:	Report No:	Drawing No:
1:20	53724-00	PRES003	figure 4a

53724-00(PRES003)GN-WA001 AUG 05/2009



SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP AND SALVAGE FACILITY

AKRON, OHIO

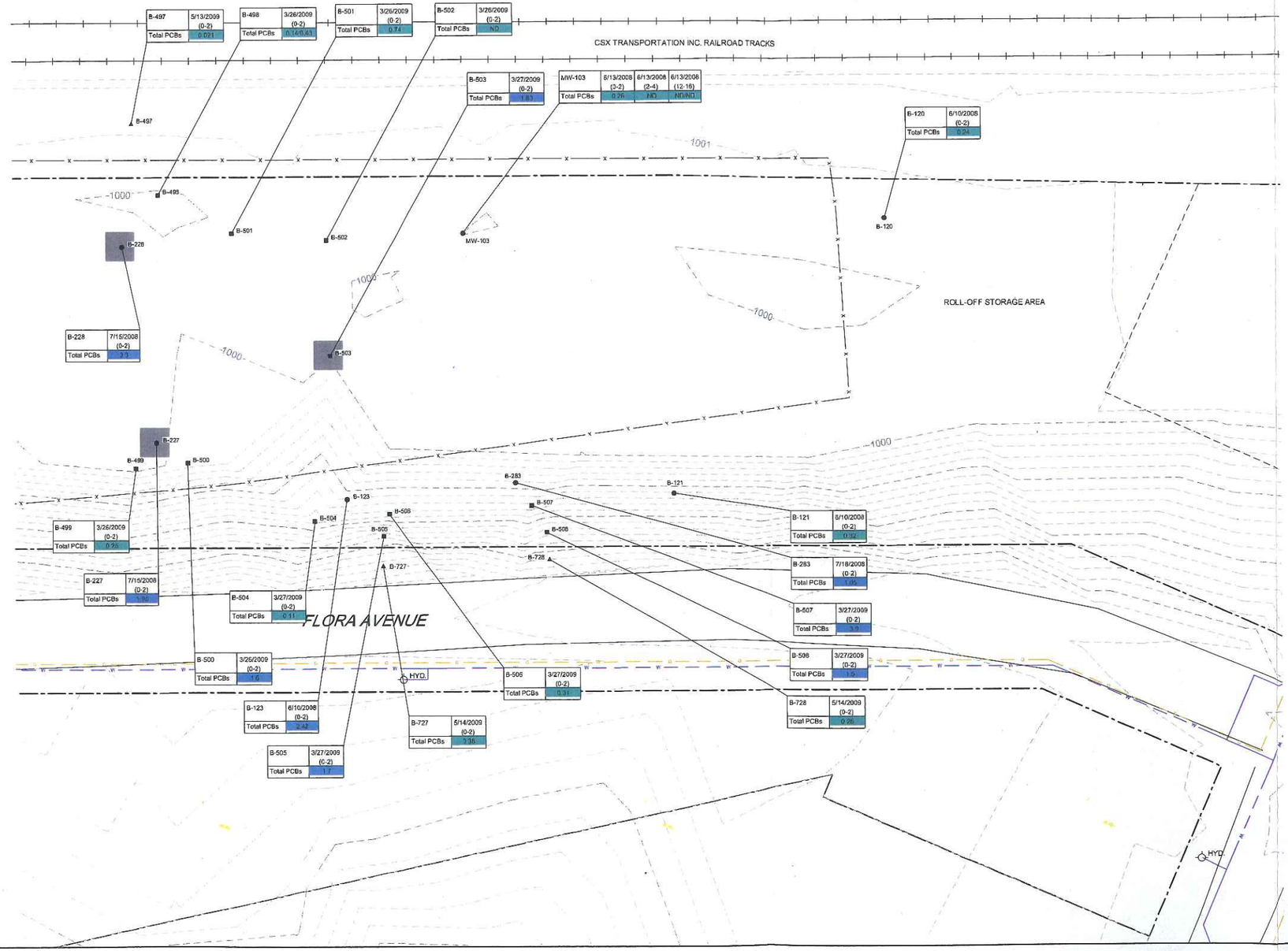
PROPOSED SOIL EXCAVATION PLAN PRE-SHREDDER PROCESSING

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TANNER COMPANY, 2007-08, BY SURVEY REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES AETA/CSM LAND TITLE SURVEY, PROJECT NO. T-108, APRIL 2008.

Project Manager:	Reviewed By:	Date:
H.C.	G.P.	AUGUST 2009
Scale: 1:20	Project No: 53724-00	Report No: PRES003
		Drawing No: figure 4b

53724-03(PRESC03)GN-WA001 AUG 05/2009



0 10 20ft

LEGEND

- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE
- CONTOUR
- SHA DATA
- CRA DATA (MARCH 2009)
- CRA DATA (MAY 2009)
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH
- RESULT (mg/kg)
- PARAMETER

B-28B | 7/21/2008 | (0-2) | Total PCBs | 38.1

TOTAL PCB CONCENTRATIONS

- < 1 ppm PCBs
- ≥ 1 up to < 10 ppm PCBs
- ≥ 10 up to < 25 ppm PCBs
- ≥ 25 up to < 50 ppm PCBs
- ≥ 50 ppm PCBs
- PROPOSED ON-SITE EXCAVATION
- PROPOSED OFF-SITE EXCAVATION

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

CITY SCRAP AND SALVAGE FACILITY

AKRON, OHIO

PROPOSED SOIL EXCAVATION PLAN VEHICLE PREPARATION AREA

CONESTOGA-ROVERS & ASSOCIATES

Source Reference: SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 2327/08 ITY SCRAP REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY, PROJECT NO. T-1693, APRIL 2005

Project Manager:	Reviewed By:	Date:	
H.C.	G.P.	JUNE 2009	
Scale: 1:20	Project N°: 53724-01	Report N°: RAMA002	Drawing N°: figure 4c

53724-01(RAMA002)GH-WA005 JUL 27/2009